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Transcript of Marcello Canova, Ph.D.

Date: April 21, 2023

Case: Huang -v- Ohio State University and Rizzoni

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Conducted on April 21, 2023

<p>1 UNITED STATES DISTRICT COURT</p> <p>2 FOR THE SOUTHERN DISTRICT OF OHIO</p> <p>3 EASTERN DIVISION</p> <p>4</p> <p>5 ----- x</p> <p>6 MENG HUANG, : CASE NO:</p> <p>7 Plaintiff, : 2:19-cv-1976</p> <p>8 v. :</p> <p>9 THE OHIO STATE : Judge James L. Graham</p> <p>10 UNIVERSITY and GIORGIO : Magistrate Judge</p> <p>11 RIZZONI, : Chelsey M. Vascura</p> <p>12 Defendants. :</p> <p>13 ----- x</p> <p>14</p> <p>15</p> <p>16</p> <p>17 Video Deposition of MARCELLO CANOVA, PH.D.</p> <p>18 COLUMBUS, OHIO</p> <p>19 Friday, April 21, 2023</p> <p>20 4:05 p.m.</p> <p>21</p> <p>22 Job No.: 489342</p> <p>23 Pages: 1 - 102</p> <p>24 Reporter: Debra A. Dibble, RDR, CRR, CRC</p> <p>25 Notary Public</p>	<p>1 REMOTE APPEARANCES:</p> <p>2</p> <p>3 ON BEHALF OF PLAINTIFF, MENG HAUNG:</p> <p>4 PETER PATTAKOS, ESQUIRE</p> <p>5 PATTAKOS LAW FIRM LLC</p> <p>6 101 Ghent Road</p> <p>7 Fairlawn, Ohio 44333</p> <p>8 (330) 836-8533</p> <p>9 info@pattakoslaw.com</p> <p>10</p> <p>11 ON BEHALF OF DEFENDANTS, OHIO STATE UNIVERSITY and</p> <p>12 GIORGIO RIZZONI: (Present with witness)</p> <p>13 CHRISTINA L. CORL, ESQUIRE</p> <p>14 PLUNKETT COONEY</p> <p>15 716 MT. AIRYSHIRE</p> <p>16 SUITE 150</p> <p>17 COLUMBUS, OHIO 43235</p> <p>18 (614) 629-3018</p> <p>19 ccorl@plunkettcooney.com</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 Nache Buie, Videographer</p> <p>23 Michelle Mejia, Document Tech</p> <p>24 Meng Huang</p> <p>25 --o0o--</p>
<p>1 Video deposition of MARCELLO CANOVA,</p> <p>2 PH.D., held remotely:</p> <p>3</p> <p>4 PLUNKETT COONEY</p> <p>5 716 Mt. Airyshire, Suite 150</p> <p>6 COLUMBUS, OHIO</p> <p>7</p> <p>8</p> <p>9</p> <p>10 Pursuant to Notice, before Debra A. Dibble,</p> <p>11 Registered Diplomate Reporter, Certified Realtime</p> <p>12 Reporter, and Notary Public.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2</p> <p>3 PROCEEDINGS 6</p> <p>4</p> <p>5 EXAMINATION OF MARCELLO CANOVA, PH.D.:</p> <p>6</p> <p>7 BY MS. CORL 7</p> <p>8 BY MR. PATTAKOS 17</p> <p>9</p> <p>10 CERTIFICATE OF REPORTER 102</p> <p>11</p> <p>12</p> <p>13 LITIGATION SUPPORT INDEX PAGE</p> <p>14 Certified Question 29</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>5</p> <p>1 DEPOSITION EXHIBITS</p> <p>2 NUMBER DESCRIPTION PAGE</p> <p>3 Exhibit 1 E-mail(s), Subj: Re: 58</p> <p>4 Candidacy Exam Dissertation</p> <p>5 Proposal and Written Exam -</p> <p>6 Meng Huang_20171201,</p> <p>7 OSU_009787-009788</p> <p>8 Exhibit 2 E-mail(s), Subj: Re: Meng 71</p> <p>9 Huang candidacy exam,</p> <p>10 OSU_010371-010372</p> <p>11 Exhibit 3 E-mail(s), Subj: Re: Meng 72</p> <p>12 Huang candidacy exam,</p> <p>13 OSU_010536</p> <p>14 Exhibit 4 E-mail(s), Subj: RE: Meng, 83</p> <p>15 OSU_009795-009797</p> <p>16 Exhibit 5 Stockar_PhDdissertation.pdf 91</p> <p>17 (2.15 MB)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>7</p> <p>1 -----</p> <p>2 EXAMINATION</p> <p>3 -----</p> <p>4 BY MS. CORL:</p> <p>5 Q Please state your full name for the</p> <p>6 record.</p> <p>7 A My full name is Marcello Canova.</p> <p>8 Q And, Dr. Canova, who is your current</p> <p>9 employer?</p> <p>10 A My current employer is the Ohio State</p> <p>11 University, and specifically the Department of</p> <p>12 Mechanical and Aerospace Engineering.</p> <p>13 Q Okay. How long have you been with the</p> <p>14 University?</p> <p>15 A I have started as a faculty in 2011, so</p> <p>16 this is my current appointment. And then prior to</p> <p>17 that, I was hired at the Center For Automotive</p> <p>18 Research, which is also under the Ohio State</p> <p>19 University, starting in 2004.</p> <p>20 Q Okay. So tell the jury about some of</p> <p>21 the -- about your educational background and how</p> <p>22 you got to where you are today at the College of</p> <p>23 Engineering.</p> <p>24 A Yes. I'm a Ph.D. in mechanical</p> <p>25 engineering from an Italian university, and my</p>
<p>6</p> <p>1 -----</p> <p>2 PROCEEDINGS</p> <p>3 April 21, 2023, 4:05 p.m. EDT</p> <p>4 -----</p> <p>5 THE VIDEOGRAPHER: Here begins media No. 1</p> <p>6 in the videotaped deposition of Marcello Canova,</p> <p>7 Ph.D. in the matter of Haung versus Ohio State</p> <p>8 University and Rizzoni, in the United States for</p> <p>9 the Southern District of Ohio, Eastern Division,</p> <p>10 Case No. 2:19-cv-1976-JLG-CMV.</p> <p>11 Today's date is April 21st, 2023, and the</p> <p>12 time on the video monitor is 4:07 p.m.</p> <p>13 The videographer today is Nache Buie,</p> <p>14 representing Planet Depos. This video deposition</p> <p>15 is taking place remotely. Appearances will be</p> <p>16 noted on the stenographic record.</p> <p>17 The court reporter today is Debbie Dibble,</p> <p>18 also representing Planet Depos, And will the</p> <p>19 reporter please swear in the witness.</p> <p>20 -----</p> <p>21 MARCELLO CANOVA, PH.D.,</p> <p>22 having been duly sworn,</p> <p>23 testified as follows:</p> <p>24 * * *</p> <p>25 * * *</p>	<p>8</p> <p>1 background is in mathematical modeling and control</p> <p>2 of vehicle propulsion systems. My current</p> <p>3 research activities, actually since the last --</p> <p>4 for the last ten years I have been working on</p> <p>5 lithium ion batteries and energy storage systems</p> <p>6 for electrification of transportation.</p> <p>7 Q And do you know Dr. Giorgio Rizzoni?</p> <p>8 A I do know Dr. Giorgio Rizzoni.</p> <p>9 Q And how do you know him?</p> <p>10 A So I met Dr. Giorgio Rizzoni for the first</p> <p>11 time in 2004. He recruited me when I was a Ph.D.</p> <p>12 student, and he offered me to spend an exchange</p> <p>13 period at the Ohio State University when I was on</p> <p>14 a study abroad program.</p> <p>15 When I graduated with the Ph.D. in '06,</p> <p>16 Dr. Rizzoni offered me a position of staff</p> <p>17 researcher at the Center For Automotive Research.</p> <p>18 And then since 2011, I became a faculty in the</p> <p>19 Department of Mechanical and Aerospace</p> <p>20 Engineering, and since then Professor Rizzoni and</p> <p>21 I are professional colleagues.</p> <p>22 Q Okay. So since 2011, has Dr. Rizzoni</p> <p>23 supervised you or have any supervisory authority</p> <p>24 of you of any -- over you of any kind?</p> <p>25 A No. We are effectively peers. I directly</p>

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<p>9</p> <p>1 report, as Dr. Rizzoni, to the department chair of</p> <p>2 our department at the University.</p> <p>3 Q So you do not report to Dr. Rizzoni?</p> <p>4 A I do not report to Dr. Rizzoni.</p> <p>5 Q Okay. Do you know Meng Huang?</p> <p>6 A I do.</p> <p>7 Q How do you know her?</p> <p>8 A She was a Ph.D. student at Ohio State at</p> <p>9 the Center for Automotive Research between 2015,</p> <p>10 approximately, to 2018.</p> <p>11 Q Did there come a point in time when you</p> <p>12 were asked to sit on Ms. Huang's Ph.D. candidacy</p> <p>13 committee?</p> <p>14 A Yes.</p> <p>15 Q And who asked you to do that?</p> <p>16 A Her advisor, Professor Rizzoni.</p> <p>17 Q Explain to the jury, you know, what a</p> <p>18 Ph.D. candidacy exam is and the mechanics around</p> <p>19 that.</p> <p>20 A Yes. So the candidacy exam in the Ph.D.</p> <p>21 program is an exam that happens more or less at</p> <p>22 the middle of the way of a Ph.D., and it's an exam</p> <p>23 that tests the knowledge of fundamental research</p> <p>24 skills and knowledge of fundamentals in the</p> <p>25 disciplines of mechanical engineering, but with a</p>	<p>11</p> <p>1 frequent communication.</p> <p>2 So Dr. Rizzoni expressed multiple times</p> <p>3 the frustration with this particular student</p> <p>4 because of her lack of responsiveness to e-mails,</p> <p>5 to requests. She would not attend meetings that</p> <p>6 were scheduled. She would not come prepared to</p> <p>7 those meetings.</p> <p>8 And also he was frustrated because he was</p> <p>9 repeatedly trying to provide her mentorship and</p> <p>10 guidance to help her through the Ph.D. program,</p> <p>11 but she would not listen to him and just be</p> <p>12 defiant of his suggestions.</p> <p>13 Q At any time prior to Ms. Huang's Ph.D.</p> <p>14 examination, did you and Dr. Rizzoni discuss</p> <p>15 failing her in the exam?</p> <p>16 A Never.</p> <p>17 Q At any time prior to the examination, did</p> <p>18 Dr. Rizzoni tell you what to say during the exam?</p> <p>19 A No.</p> <p>20 Q At any time prior to the examination did</p> <p>21 Dr. Rizzoni talk to you about how you should react</p> <p>22 to Ms. Huang?</p> <p>23 A No.</p> <p>24 Q At any time prior to the examination did</p> <p>25 you discuss with anyone failing Ms. Huang on her</p>
<p>10</p> <p>1 focus on a research proposal that the candidate,</p> <p>2 the Ph.D. candidate, that's the student at that</p> <p>3 point, has to prepare and has to present to the</p> <p>4 exam committee that is composed by a number of</p> <p>5 Ohio State University faculty.</p> <p>6 And then the student has to withstand an</p> <p>7 oral examination of approximately two hours, where</p> <p>8 the candidate needs to prove the viability of the</p> <p>9 proposed research and also solid knowledge and</p> <p>10 understanding of the fundamentals and the</p> <p>11 background and the theories and the methods that</p> <p>12 will allow the candidate to conduct and complete</p> <p>13 the research.</p> <p>14 Q How many committee members were on</p> <p>15 Ms. Huang's candidacy committee?</p> <p>16 A Five.</p> <p>17 Q Now, at any time prior to the candidacy</p> <p>18 exam, did Dr. Rizzoni speak to you about</p> <p>19 Ms. Huang?</p> <p>20 A Yes.</p> <p>21 Q What did he tell you?</p> <p>22 A So, because we are colleagues and we have</p> <p>23 offices around pretty close, it is quite frequent</p> <p>24 that Dr. Rizzoni and I communicate. We're also</p> <p>25 colleagues in a project, and so we have a pretty</p>	<p>12</p> <p>1 exam?</p> <p>2 A No.</p> <p>3 Q So do you remember when the exam was?</p> <p>4 A I -- yeah. Dates are a little blurry but</p> <p>5 I believe it was between November and December of</p> <p>6 2017, I think.</p> <p>7 Q Okay. If you would, Dr. Canova, please</p> <p>8 describe what happened in Ms. Huang's Ph.D.</p> <p>9 candidacy exam.</p> <p>10 A Okay. So at the moment of the exam, the</p> <p>11 committee had already read the written proposal</p> <p>12 that Ms. Huang prepared and shared with the</p> <p>13 committee. And we had a number of questions with</p> <p>14 the proposal that we brought into the exam, as it</p> <p>15 is actually common practice during our candidacy</p> <p>16 examination.</p> <p>17 And so I started the exam by asking the</p> <p>18 first question, which was on a fairly basic</p> <p>19 subject that deals with the topic of the proposal</p> <p>20 which was degradation and aging of lithium ion</p> <p>21 battery for electric vehicle.</p> <p>22 The candidate began answering the question</p> <p>23 in a way that was incorrect. And at some point</p> <p>24 during that answer I pointed to the candidate that</p> <p>25 that answer might not have been the correct one.</p>

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<p>13</p> <p>1 And the answer that I received was fairly</p> <p>2 confrontational. I was actually -- I was actually</p> <p>3 confronted by her and she was telling that, no,</p> <p>4 this is the way this should be. And so that</p> <p>5 created a very uncomfortable and awkward situation</p> <p>6 right at the beginning.</p> <p>7 Q And then how did the rest of the</p> <p>8 examination go after that?</p> <p>9 A So yeah, the exam was fairly unusual in</p> <p>10 terms of experience because the candidate appeared</p> <p>11 at times defensive, at times confrontational, at</p> <p>12 times dismissive of the questions that were being</p> <p>13 asked, not just by me but also the other committee</p> <p>14 members.</p> <p>15 It was -- as I mentioned, it was a fairly</p> <p>16 awkward and, again, uncomfortable experience for</p> <p>17 me and the other committee members. Where it was</p> <p>18 clear, even after, you know, the first few</p> <p>19 questions, that the candidate was not</p> <p>20 collaborating with the exam process, but was, you</p> <p>21 know, just treating the exam with, you know, a</p> <p>22 fairly dismissive attitude and she was not, in our</p> <p>23 opinion, mindful of the importance of this exam.</p> <p>24 Q And then what happened at the conclusion</p> <p>25 of the examination?</p>	<p>15</p> <p>1 THE WITNESS: Hello.</p> <p>2 MR. PATTAKOS: Thanks, Mr. Canova. Just</p> <p>3 give me one moment off the record, please.</p> <p>4 THE WITNESS: Yeah.</p> <p>5 THE VIDEOGRAPHER: We're going off the</p> <p>6 record and the time is 4:19 p.m.</p> <p>7 (Recess taken, 4:19 p.m. to 4:23 p.m. EDT)</p> <p>8 THE VIDEOGRAPHER: We are going back on</p> <p>9 the record and the time is 4:23 p.m.</p> <p>10 MS. CORL: For the record, this is</p> <p>11 Christina Corl, counsel for Dr. Rizzoni. While we</p> <p>12 were off the record, Counsel for plaintiff</p> <p>13 identified four exhibits that he intends to use in</p> <p>14 this deposition. There evidently is some issue</p> <p>15 about whether these exhibits were actually</p> <p>16 identified as trial exhibits as required by the</p> <p>17 Court's pretrial order. Plaintiffs' counsel can</p> <p>18 do whatever he wants with them. I'm only noting</p> <p>19 an objection on the record that if these exhibits</p> <p>20 have not been previously identified as required by</p> <p>21 the Court's orders in the pretrial order as trial</p> <p>22 exhibits, I'm going to object to their use with</p> <p>23 this witness. But because of the circumstances,</p> <p>24 obviously plaintiff's counsel can proceed as he</p> <p>25 chooses.</p>
<p>14</p> <p>1 A So the exam lasted for about two hours, or</p> <p>2 maybe 1 hour and 45 minutes. At the end of which</p> <p>3 we requested the candidate to leave the room and</p> <p>4 then, at closed doors, we had a conversation among</p> <p>5 the committee members on what was the outcome of</p> <p>6 that exam and overall experience.</p> <p>7 Q Okay. And what did you decide was your</p> <p>8 professional opinion about whether Ms. Huang</p> <p>9 passed or failed the exam?</p> <p>10 A My -- so based on joint evaluation of the</p> <p>11 written component of the proposal and the conduct</p> <p>12 of the candidate during the oral part of the exam,</p> <p>13 my professional opinion was that the candidate was</p> <p>14 not much sure enough to pass the qualifying exam,</p> <p>15 and so my suggestion would have been a failing</p> <p>16 exam, a failed exam.</p> <p>17 Q Okay. And during the discussion after the</p> <p>18 exam, was there ever a time that Dr. Rizzoni</p> <p>19 stated an opinion that Ms. Huang should be failed?</p> <p>20 A No, Dr. Rizzoni did not express any</p> <p>21 opinion on whether Ms. Huang should have failed</p> <p>22 the exam.</p> <p>23 MS. CORL: Okay. I don't have anymore</p> <p>24 questions. Thank you.</p> <p>25 MR. PATTAKOS: Hello.</p>	<p>16</p> <p>1 MR. PATTAKOS: In response to that, I will</p> <p>2 note for the record that a pretrial order on</p> <p>3 exhibits is not controlling when an opposing party</p> <p>4 asks questions from their own witnesses that</p> <p>5 implicates the relevance of documents that have</p> <p>6 been produced in this litigation. I believe that</p> <p>7 all four of these exhibits have already been</p> <p>8 identified. To the extent they have not, these</p> <p>9 documents are documents that are in Ohio State's</p> <p>10 own production. Dr. Rizzoni has been examined on</p> <p>11 them. They're clearly relevant. There's no</p> <p>12 surprise here. So that would be our response.</p> <p>13 Secondly, I would note that we are</p> <p>14 accommodating the defendant by proceeding with</p> <p>15 Dr. Canova's deposition today to -- for his</p> <p>16 convenience and apparently for the convenience of</p> <p>17 the defendant. This is a courtesy. And I would</p> <p>18 certainly ask that we not be punished for that</p> <p>19 courtesy as well.</p> <p>20 With that, I'm ready to begin.</p> <p>21 The witness is sworn in?</p> <p>22 * * *</p> <p>23 * * *</p> <p>24 * * *</p> <p>25 * * *</p>

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<p>17</p> <p>1 -----</p> <p>2 EXAMINATION</p> <p>3 -----</p> <p>4 BY MR. PATTAKOS:</p> <p>5 Q Sir, you understand that you are still</p> <p>6 under oath, Dr. Canova?</p> <p>7 A I do.</p> <p>8 Q Okay. Thank you.</p> <p>9 Good afternoon.</p> <p>10 A Good afternoon.</p> <p>11 Q My name is Peter Pattakos. I represent</p> <p>12 the plaintiff Meng Huang in this lawsuit. You</p> <p>13 understand that, correct?</p> <p>14 A I do.</p> <p>15 Q And this is the first time your deposition</p> <p>16 has been taken?</p> <p>17 A Yes.</p> <p>18 Q Have you ever testified under oath before?</p> <p>19 A No.</p> <p>20 Q This is the first time?</p> <p>21 A Yes.</p> <p>22 Q Okay. So you do understand that you are</p> <p>23 testifying under penalty of perjury; correct?</p> <p>24 A I do.</p> <p>25 Q Thank you.</p>	<p>19</p> <p>1 abroad period at the Ohio State University. That</p> <p>2 was -- I started in May of 2004 and I believe I</p> <p>3 left in July or August of 2005.</p> <p>4 Q Okay. And -- so your 19 years working for</p> <p>5 Ohio State has not been continuous?</p> <p>6 A There has been a very brief period that I</p> <p>7 was in my University of Parma because, when I came</p> <p>8 to Ohio State, as I mentioned, I was a visiting</p> <p>9 scholar, and -- which is a position that is</p> <p>10 typically created for students of a university</p> <p>11 abroad, that decide to spend a trainship period at</p> <p>12 an American University. So I was still affiliated</p> <p>13 with the University of Parma; and I finished my</p> <p>14 Ph.D. and then I came back to Ohio State on a</p> <p>15 different research position.</p> <p>16 Q And when did you come back to Ohio State?</p> <p>17 A It was about March or April of '06.</p> <p>18 Q And what was your position when you came</p> <p>19 back to Ohio State?</p> <p>20 A So I was a postdoctoral researcher.</p> <p>21 Q Where?</p> <p>22 A At the Center of Automotive Research,</p> <p>23 which is at Ohio State.</p> <p>24 Q And your employment with the University</p> <p>25 has been at the Center For Automotive Research</p>
<p>18</p> <p>1 Dr. Canova, why is it that you are not</p> <p>2 available for the trial in this matter that is set</p> <p>3 to begin on May 1st?</p> <p>4 MS. CORL: Object to relevance.</p> <p>5 You can answer.</p> <p>6 A I'm going on a honeymoon trip starting</p> <p>7 tomorrow for two weeks.</p> <p>8 BY MR. PATTAKOS:</p> <p>9 Q Congratulations.</p> <p>10 A Thank you.</p> <p>11 Q I trust you are leaving the country?</p> <p>12 A I am.</p> <p>13 Q Okay. Dr. Canova, how long have you been</p> <p>14 working at Ohio State?</p> <p>15 A Since 2004, so almost 19 years.</p> <p>16 Q And what was your position when you began</p> <p>17 working at Ohio State?</p> <p>18 A I was a visiting scholar. It's a research</p> <p>19 staff position.</p> <p>20 Q How did it come to be that you attended</p> <p>21 Ohio State University as a -- strike that.</p> <p>22 How did it come about that you became a</p> <p>23 visiting scholar at Ohio State University?</p> <p>24 A Yeah, as I mentioned, Dr. Rizzoni</p> <p>25 recruited me as an exchange student for a study</p>	<p>20</p> <p>1 ever since then; correct?</p> <p>2 A No. I was employed by the Center from, I</p> <p>3 said, '04 to 2010. And then in 2011, I became a</p> <p>4 faculty in the mechanical engineering. So I</p> <p>5 changed -- I'm still under the Ohio State</p> <p>6 University, but my employment, my position and my</p> <p>7 chain of reporting has changed.</p> <p>8 Q So you do not work for the Center For</p> <p>9 Automotive Research anymore?</p> <p>10 A I'm affiliated with the Center as a</p> <p>11 faculty, but my employment is under the Department</p> <p>12 of Mechanical Engineering.</p> <p>13 Q And just to be clear, the Center For</p> <p>14 Automotive Research is within the school of</p> <p>15 mechanical engineering; correct?</p> <p>16 A No. So the Center For Automotive Research</p> <p>17 is a horizontal organization that is under the</p> <p>18 College of Engineering.</p> <p>19 Now, the department, as the mechanical --</p> <p>20 the Department of Mechanical Aerospace Engineering</p> <p>21 is also managed under the college, but the two</p> <p>22 entities are separated from each other. So even</p> <p>23 though the two entities are both reporting to the</p> <p>24 college, the Center and the Department don't have</p> <p>25 a mutual relationship. Or at least they don't</p>

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<p>21</p> <p>1 have like a -- yeah, they don't have any 2 dependence. 3 Q Thank you. 4 So how did it come about that Dr. Rizzoni 5 recruited you? 6 A We met at a conference in Italy two -- one 7 year prior, 2003. And I was presenting a work at 8 the conference and Dr. Rizzoni was in the 9 audience. I remember my adviser introduced me to 10 Dr. Rizzoni and, you know, we exchanged questions 11 and answers and discussion, and we built a 12 relationship from there. 13 Q So you were born in Italy; correct? 14 A Correct. 15 Q Sir, what is your salary at the Ohio State 16 University? 17 A Currently? 18 MS. CORL: Object to relevance. You can 19 answer. 20 A Yeah, sorry. 21 Currently? 22 BY MR. PATTAKOS: 23 Q Yes. 24 A Okay. As a faculty, it's about \$120,000 a 25 year.</p>	<p>23</p> <p>1 MS. CORL: Object to relevance. 2 You can answer. 3 A It is true. 4 BY MR. PATTAKOS: 5 Q Okay. And what is her salary? 6 A Her salary -- 7 MS. CORL: Same objection. 8 A Sorry. 9 Her salary is about \$98,000 per year, give 10 or take. 11 Q And does she earn supplemental 12 compensation as well or would have the opportunity 13 to do that? 14 MS. CORL: Same objection. 15 Go ahead. 16 A She does not. 17 BY MR. PATTAKOS: 18 Q Do you -- you mentioned the University of 19 Parma. And that is in Italy? 20 A Yes. Yes. 21 Q We have a Parma here in Ohio, too. 22 A I know. It's right off in Cleveland. 23 I've been there. 24 Q My parents lived there right before I was 25 born, so...</p>
<p>22</p> <p>1 Q Is there any other income that you make? 2 A Yes. 3 Q And where is that from? 4 A So there are -- 5 MS. CORL: Same objection to relevance. 6 You can go ahead. 7 A Yes. So there are -- faculty can earn 8 additional income by performing additional duties. 9 For example, serving in University committees or 10 departmental administrative committees, they can 11 earn supplemental compensation. We earn 12 supplemental compensation if we are, for example, 13 teaching continuing education courses, and we 14 are -- we could also have the ability to pay a 15 supplement to our summer stipend by charging a 16 research project. 17 BY MR. PATTAKOS: 18 Q Dr. Canova, what's -- how much 19 compensation from the Ohio State University did 20 you earn in the last year, whether it was a salary 21 or other compensation? 22 A That's about 104 -- 150, 160K. 23 Q Okay. And it's true that your wife is 24 also employed at the Ohio State University in the 25 same school that you are?</p>	<p>24</p> <p>1 Are you still affiliated with the 2 University of Parma in any way? 3 A Besides in a professional connections, no, 4 I do not have any form of affiliation. 5 Q Okay. Dr. Rizzoni has described you under 6 oath as a very close professional colleague and 7 also a close friend. Is it safe to assume that 8 you would agree with that? 9 A The relationship is mutual. 10 Q Okay. He said you had a special kinship. 11 Do you agree with that? 12 A Yes, I do agree with that. 13 Q It's fair to say, Dr. Canova, that you are 14 one of Rizzoni's protégés? 15 MS. CORL: Object to the form of the 16 question. 17 You can answer if you know what he means 18 by protégé. 19 A I personally feel -- 20 MR. PATTAKOS: Please don't coach the 21 witness. Please stop coaching the witness. The 22 judge would never let you do that at trial. I'm 23 going to ask you to not do that here. Thank you. 24 You can state your objection and -- you 25 can state that you object. You can explain your</p>

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<p>25</p> <p>1 objections later. Please stop coaching the 2 witness. Thank you. 3 BY MR. PATTAKOS: 4 Q You know what a protégé is, correct, 5 Dr. Canova? 6 A Yes. 7 Q Would you say it's a fair description of 8 your relationship with Dr. Rizzoni that he would 9 consider you one of his protégés? 10 A I would say it is not. 11 Q Why would you say that? 12 A Because Giorgio has been mentoring many of 13 my colleagues. And I have the strong feeling that 14 even though it was absolutely friendly and very, 15 very nice human being to all of us, he is always 16 been able to maintain a sufficient separation 17 between professional and personal relationships. 18 Q Okay. 19 A In other words, we've been friends, we had 20 many dinners together, but we also had plenty of 21 disagreements on a professional setting. 22 Q Sure. Okay. 23 But you would certainly agree that 24 Dr. Rizzoni has been very influential to the 25 success of your career; correct?</p>	<p>27</p> <p>1 Yeah, just... 2 Q Okay. Dr. Canova, have you reviewed the 3 complaint in this lawsuit? 4 A I have not. 5 Q Have you reviewed any documents relating 6 to this lawsuit? 7 A No. 8 Q Are you familiar with the basic 9 allegations of this lawsuit? 10 A Vaguely. 11 Q Vaguely. What is it that you understand 12 this lawsuit to be about? 13 A I think there is -- there is -- it's about 14 the sexual harassment and like a power -- a 15 relation -- power relationship. 16 Q Have you spent time preparing with any 17 attorneys for this deposition today? 18 A Yes. 19 Q And what are the names of those attorneys? 20 A Christina Corl. 21 Q Have you prepared with any other attorneys 22 about this case? 23 A No. 24 Q Is there anyone in the room there with you 25 where you are sitting?</p>
<p>26</p> <p>1 A He gave me an opportunity to become a 2 researcher in the United States, but I feel I made 3 my own way. 4 Q I don't mean to suggest otherwise, sir. 5 You know that Rizzoni has said that he 6 expects you to take over his position as -- at the 7 top of the Center For Automotive Research? 8 A That has been the ongoing joke of the 9 office. It's because everybody assume -- because 10 people assumes that, it doesn't necessarily mean 11 that is true. I -- effectively, he has never said 12 that to me or anyone else. It's just what people 13 assume, I guess. 14 Q Well, I'm -- if someone in this lawsuit 15 were to testify that he has in fact said that to 16 them, do you have any reason to believe that it's 17 not true? 18 A No. 19 Q Okay. 20 A In my adage, he just has never said that 21 to me. 22 Q Okay. You said that people assume this. 23 How do you know that people assume this? 24 A It's, you know, from jokes in the office. 25 You know, sometimes having casual conversation.</p>	<p>28</p> <p>1 A Yes, there is the attorney. 2 Q Okay. Who is in there in the room with 3 you? 4 A Is just me and Christina. 5 Q Okay. How many times have you spoken with 6 Christina about this case? 7 A Including today, three times. 8 Q You spoke with her today? And when were 9 the other two times that you've spoken with 10 Christina about this case? 11 A Last -- the first time I spoke with 12 Christina was last Friday, and then I spoke with 13 her briefly on the phone yesterday. 14 Q Okay. How long did you speak with her 15 last Friday? 16 A For about 40, 45 minutes. 17 Q And how long did you speak with her on the 18 phone yesterday? 19 A 15 minutes, tops. 20 Q And how long have you spoken with her 21 today before this deposition? 22 A I was here at 3:20. So for about 40 23 minutes. Sorry. 24 Q And what have you and Christina talked 25 about?</p>

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<p>29</p> <p>1 MS. CORL: Objection. That's</p> <p>2 attorney-client privilege and work product and</p> <p>3 he's not answering that.</p> <p>4 MR. PATTAKOS: How is that attorney-client</p> <p>5 privilege?</p> <p>6 MS. CORL: This is a current employee of</p> <p>7 the University, and my prep of trial witnesses is</p> <p>8 attorney-client privileged and work product. He</p> <p>9 is not answering that question.</p> <p>10 MR. PATTAKOS: Wow.</p> <p>11 BY MR. PATTAKOS:</p> <p>12 Q Dr. Canova, do you feel like you needed to</p> <p>13 spend two hours preparing with Christina to tell</p> <p>14 the truth about this case?</p> <p>15 A No.</p> <p>16 Q Dr. Canova, I noticed you just looking to</p> <p>17 your right. Were you looking at Christina just</p> <p>18 then?</p> <p>19 A No.</p> <p>20 Q Who were you looking at?</p> <p>21 A No, I was just looking at a chair here.</p> <p>22 Q Where is Christina at?</p> <p>23 A I apologize, I'm -- as I mentioned, this</p> <p>24 is the first time that I do it, so I'm not really</p> <p>25 sure what to do.</p>	<p>31</p> <p>1 MS. CORL: Can we take a quick break? I'm</p> <p>2 sorry, I've got something going --</p> <p>3 Can we go off the record for just one --</p> <p>4 MR. PATTAKOS: I'm not going to go off the</p> <p>5 record right now. We can take a break in a</p> <p>6 minute. I want to ask right now --</p> <p>7 MS. CORL: You can leave him on the video.</p> <p>8 Leave him on the video. I'm leaving the room. I</p> <p>9 have an emergency I have to take care of. You can</p> <p>10 leave him on the video, you can leave the audio</p> <p>11 on. I have something I have to talk to my staff</p> <p>12 about.</p> <p>13 MR. PATTAKOS: I want to ask a question</p> <p>14 right now, and then you can leave the room,</p> <p>15 Christina.</p> <p>16 BY MR. PATTAKOS:</p> <p>17 Q Dr. Canova, I just saw someone walk across</p> <p>18 the room in front of the camera from your left --</p> <p>19 I'm sorry, from your right to your left. Who was</p> <p>20 that?</p> <p>21 A I don't know.</p> <p>22 MS. CORL: It was me. The only person in</p> <p>23 the room is me.</p> <p>24 MR. PATTAKOS: Okay. So it's true that</p> <p>25 Christina was sitting on your right and not on</p>
<p>30</p> <p>1 Q All you've got to do is tell the truth.</p> <p>2 A Yes. Which I am.</p> <p>3 Q Where is Christina in the room with you</p> <p>4 right now?</p> <p>5 A She's sitting here on the side of the</p> <p>6 table.</p> <p>7 Q Point to the side of the table that</p> <p>8 Christina is sitting on.</p> <p>9 (Witness points to his left.)</p> <p>10 BY MR. PATTAKOS:</p> <p>11 Q Okay. Interesting.</p> <p>12 So you've spoken with Christina for, you</p> <p>13 said 45 minutes, 40 minutes, plus 15 minutes.</p> <p>14 Let's call that about an hour and 40 minutes. How</p> <p>15 is it that you only have a vague understanding of</p> <p>16 what that case is about if you had spent an hour</p> <p>17 and 40 minutes talking with the lead attorney in</p> <p>18 the case for the defendant about the case?</p> <p>19 Are you struggling to --</p> <p>20 A I spoke about -- I -- I spoke about the</p> <p>21 exam itself and, you know, what was my role with</p> <p>22 Dr. Rizzoni, but I did not speak about the, you</p> <p>23 know, what is the nature of this -- of the</p> <p>24 lawsuit, at least in details, sufficiently for me</p> <p>25 to understand the full context.</p>	<p>32</p> <p>1 your left. Wow.</p> <p>2 Okay. You can take a break. We can go</p> <p>3 off the record.</p> <p>4 MS. CORL: Okay.</p> <p>5 THE VIDEOGRAPHER: Please stand by. We're</p> <p>6 going off the record and the time is 4:44 p.m.</p> <p>7 (Recess taken, 4:44 p.m. to 4:48 p.m. EDT)</p> <p>8 THE VIDEOGRAPHER: Everyone please stand</p> <p>9 by. Thank you.</p> <p>10 We are going back on the record and the</p> <p>11 time is 4:48 p.m.</p> <p>12 BY MR. PATTAKOS:</p> <p>13 Q Okay. I just -- let's reset the question</p> <p>14 that was pending when your attorney interrupted</p> <p>15 the deposition.</p> <p>16 Dr. Canova, I just want to understand how</p> <p>17 it is that you've spent an hour and 40 minutes or</p> <p>18 so talking about this case and your testimony with</p> <p>19 Christina Corl, the lead attorney for Dr. Rizzoni</p> <p>20 and the Ohio State University in this case, yet</p> <p>21 you claim to only have a vague understanding of</p> <p>22 what this lawsuit is about. How could that be?</p> <p>23 MS. CORL: Objection, asked and answered.</p> <p>24 You can you answer again.</p> <p>25 A Okay. We discussed what -- we discussed</p>

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<p style="text-align: right;">33</p> <p>1 what happened during the exam. Basically what -- 2 MS. CORL: You can't tell him what we 3 discussed. 4 THE WITNESS: Oh, I'm sorry. 5 MS. CORL: That's work product. 6 THE WITNESS: Okay. 7 MS. CORL: His question is why do you need 8 to talk to me and you don't know about the -- what 9 is in the complaint. 10 MR. PATTAKOS: No. Do you know what? 11 I'll restate the question. 12 BY MR. PATTAKOS: 13 Q Dr. Canova, are you struggling to 14 understand what this case is about? Are you 15 having a hard time understanding it? 16 A I mean, a little bit. 17 Q Okay. Why? 18 A I mean, I don't know the full extent of 19 the case. I -- you know, I just know that he was 20 connected with a conflicting relationship between 21 the mentor and the mentee, and my involvement in 22 the exam. 23 Q Dr. Canova, you are certainly aware that 24 my client, Meng Huang, has publicly accused 25 Dr. Rizzoni of extremely serious misconduct;</p>	<p style="text-align: right;">35</p> <p>1 Q Why was it a traumatic experience? 2 A Because the exam was something that has 3 never happened in my entire career. It was very 4 uncomfortable and, you know, it still make me 5 uncomfortable talking about it. 6 Q Why is that, sir? Why was it unlike any 7 exam in your career? 8 A Because it was not -- because of the way 9 the questions and the answers were given, the fact 10 that the candidate was very confrontational, very 11 dismissive, and not behaving appropriately. 12 Normally these exams are very, very civil and very 13 good and productive and constructive conversation. 14 It was none of that, and that sort of unsettled 15 me. 16 Q I certainly understand that, sir. Why -- 17 we can get to that. I want to talk about that, 18 but I want to get some background first. 19 Dr. Canova, has your relationship with 20 Dr. Rizzoni changed as a result of these 21 accusations? 22 A Maybe a little. 23 Q And why is that? 24 A Well, I mean, I think that if it was -- if 25 the experience was traumatic for me and I was only</p>
<p style="text-align: right;">34</p> <p>1 correct? 2 A Yes. 3 Q Okay. And this is extremely serious 4 personal misconduct that is also extremely serious 5 academic misconduct; correct? 6 A Yes. 7 Q Okay. Specifically you understand that my 8 client has alleged that Rizzoni has sexually 9 abused her over the course of years and then 10 failed her out of the Ph.D. program in retaliation 11 for her refusing his advances and threatening to 12 expose him. Do you understand that? 13 A That part I do understand. I've heard. 14 Q Okay. And you've known this for a long 15 time; isn't that true, sir? 16 A Yes. I've known these things. The story 17 went out. 18 Q You saw Meng's accusations, the lengthy 19 document that she published about these 20 allegations when they first surfaced; correct? 21 A I believe I did. I honestly have to say 22 that I don't remember it. It's been a long time 23 ago, and personally a fairly traumatic experience. 24 Q For you? 25 A Yes.</p>	<p style="text-align: right;">36</p> <p>1 marginally involved, I can imagine how difficult 2 it was for him. And, you know, for a period of 3 time he was put on administrative leave and he 4 couldn't talk to anybody. So, you know, 5 communications -- you know, he -- our, you know, 6 communications are still there, but I think it's 7 still fairly hurt as a person by what happened to 8 him. 9 Q Do you believe he's a victim? 10 A I do. 11 Q Well, you understand, Dr. Canova, that 12 your credibility is also implicated by the 13 plaintiffs' accusations in this case; correct? 14 A Yeah, I do understand that. 15 Q Uh-huh, okay. And you consider yourself a 16 victim, too, in some respects; correct? 17 A No. I mean, why should I be? 18 Q Well, why do you believe Rizzoni is? 19 A Because I've been working with him for so 20 many years and I've never seen any person, present 21 or past students of him ever complaining or ever 22 even, you know, speaking bad things about him. He 23 has an immaculate record at the University. He's 24 a well-renowned and well-regarded by students, by 25 colleagues, so this, you know, episode has kind of</p>

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<p>37</p> <p>1 shocked me a little.</p> <p>2 Q Dr. Canova, the fact is that you do not</p> <p>3 know for a fact whether the allegations of sexual</p> <p>4 harassment are true or not; correct?</p> <p>5 MS. CORL: Object to relevance. You can</p> <p>6 answer.</p> <p>7 A Would you mind repeating?</p> <p>8 MR. PATTAKOS: Please read the question</p> <p>9 back to the witness.</p> <p>10 (Whereupon, the following portion of the</p> <p>11 record was read.)</p> <p>12 QUESTION: Dr. Canova, the fact is that you</p> <p>13 do not know for a fact whether the allegations of</p> <p>14 sexual harassment are true or not; correct?</p> <p>15 (End of readback.)</p> <p>16 A I -- yeah, I don't know that as a fact. I</p> <p>17 cannot possibly know.</p> <p>18 BY MR. PATTAKOS:</p> <p>19 Q But you have your own belief, you have a</p> <p>20 hypothesis as to whether they are true or not;</p> <p>21 correct?</p> <p>22 A I do.</p> <p>23 Q You have formed a belief?</p> <p>24 A Yes.</p> <p>25 Q Okay. And you agree, Dr. Canova, that if</p>	<p>39</p> <p>1 Q And why do you believe that? What is the</p> <p>2 basis for that belief?</p> <p>3 MS. CORL: Object to relevance.</p> <p>4 You can answer.</p> <p>5 A The basis for my belief is the, you know,</p> <p>6 20 years of professional and personal connection</p> <p>7 with Dr. Rizzoni and the colleagues of the Center</p> <p>8 For Automotive Research.</p> <p>9 BY MR. PATTAKOS:</p> <p>10 Q Just in a general sense.</p> <p>11 A I mean, it's not general, it's pretty</p> <p>12 rooted in the fact that our collaboration is very</p> <p>13 strong.</p> <p>14 I know many of his current and present</p> <p>15 students. We have projects together, and so I --</p> <p>16 on a day-to-day basis, I interact not just with</p> <p>17 Professor Rizzoni, but I've interacted with almost</p> <p>18 all of his students since I was at the center, and</p> <p>19 I know them very well also on a personal basis,</p> <p>20 even now in the professional life. So I would say</p> <p>21 my beliefs are pretty rooted.</p> <p>22 Q In your day-to-day experience with</p> <p>23 Dr. Rizzoni and your belief in his character.</p> <p>24 A Yes, but not just that, as I mentioned.</p> <p>25 Q The fact that you have not seen any</p>
<p>38</p> <p>1 you believe the accusations were true, that would</p> <p>2 cause you serious concern; correct?</p> <p>3 A Yes.</p> <p>4 Q If you had reason to believe that these</p> <p>5 allegations were true, you would certainly feel</p> <p>6 some responsibility to ensure that the University,</p> <p>7 where you are employed, did something to address</p> <p>8 that misconduct; correct?</p> <p>9 MS. CORL: Object to relevancy.</p> <p>10 You can answer.</p> <p>11 A I would not feel, I would have to report</p> <p>12 it to the University as an employee.</p> <p>13 BY MR. PATTAKOS:</p> <p>14 Q Okay.</p> <p>15 A And I would also -- yes, I would also</p> <p>16 feel, yes.</p> <p>17 Q You would also feel why?</p> <p>18 A Because it's a complete inappropriate</p> <p>19 behavior and it's an abuse situation.</p> <p>20 And, you know, my -- as a University</p> <p>21 employee and my personal belief, I cannot -- you</p> <p>22 know, I don't feel like I should let that happen.</p> <p>23 Q And you believe personally that my client</p> <p>24 is lying about Rizzoni touching her?</p> <p>25 A I do believe it, yes.</p>	<p>40</p> <p>1 evidence that he has done this with any of his</p> <p>2 other students.</p> <p>3 A Correct.</p> <p>4 Q Okay. Dr. Canova, how much interaction do</p> <p>5 you have with all of Dr. Rizzoni's students?</p> <p>6 A So quite frequent and, you know, depends</p> <p>7 on the -- depends on the person. With some of</p> <p>8 them, I have worked pretty closely together. With</p> <p>9 others, I have personal friendships. But yeah, I</p> <p>10 can say it's a fairly significant number. In the</p> <p>11 tens and more.</p> <p>12 Q What was the last thing you just said?</p> <p>13 I'm sorry, I simply didn't understand.</p> <p>14 A Oh, I'm sorry. I was saying in the order</p> <p>15 of ten of tens of former and current students.</p> <p>16 Q How about a percentage, sir. What</p> <p>17 percentage of Rizzoni's students would you say</p> <p>18 you've had extensive personal interaction with?</p> <p>19 A I mean, he has advised probably 100</p> <p>20 students. I know quite well probably 20 --</p> <p>21 Q Okay.</p> <p>22 A -- also, yeah.</p> <p>23 Q Okay. Did you ever do anything to</p> <p>24 consider or investigate whether Dr. Rizzoni would</p> <p>25 specifically prey on female Chinese immigrants due</p>

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<p>41</p> <p>1 to cultural reasons?</p> <p>2 MS. CORL: Object to relevance.</p> <p>3 You can --</p> <p>4 BY MR. PATTAKOS:</p> <p>5 Q Have you ever considered that, Dr. Canova?</p> <p>6 A Yeah. I mean, when the story happened, I</p> <p>7 did consider that.</p> <p>8 Q And what have you done to rule that</p> <p>9 possibility out?</p> <p>10 A I spoke with current students that</p> <p>11 Dr. Rizzoni has and some of the former students at</p> <p>12 the center.</p> <p>13 Q And do you think they're going to be</p> <p>14 truthful with you about something that is so</p> <p>15 difficult to report?</p> <p>16 A I have the feeling that there is no reason</p> <p>17 why they shouldn't be. We have -- no, we have no,</p> <p>18 you know, employer/employee relationship, so I'm</p> <p>19 not in a position of power over them, and, you</p> <p>20 know, for -- actually, if we go back in time, many</p> <p>21 of the former students of Dr. Rizzoni are actual</p> <p>22 students who were with me when I was also student.</p> <p>23 So we are kind of the same age and same, you know,</p> <p>24 professional relation -- levels.</p> <p>25 Q Dr. Canova, are you denying that a</p>	<p>43</p> <p>1 received substantial training; correct?</p> <p>2 A Correct.</p> <p>3 Q Even when a student enters the Ph.D.</p> <p>4 program under Dr. Rizzoni, they have already</p> <p>5 received substantial training; correct?</p> <p>6 A So students entering the Ph.D. program</p> <p>7 must have at least a bachelor or a master's degree</p> <p>8 from an accredited university; and there is an</p> <p>9 admission process where, you know, we evaluate the</p> <p>10 training and the background of the student to see</p> <p>11 if she or he is suited for the program.</p> <p>12 Q And it's a highly competitive process,</p> <p>13 isn't it, sir?</p> <p>14 A It's competitive process, yes.</p> <p>15 Q You are re -- this program is recruiting</p> <p>16 students from all over the globe; correct?</p> <p>17 A Correct.</p> <p>18 Q Sir, you described the purpose of the</p> <p>19 candidacy exam in the Ph.D. program as -- and I'm</p> <p>20 going to quote you: Testing the knowledge of</p> <p>21 fundamental research skills and fundamentals in</p> <p>22 the discipline of mechanical engineering.</p> <p>23 Correct?</p> <p>24 A Correct.</p> <p>25 Q Okay. And also testing the research that</p>
<p>42</p> <p>1 professor at a University has a power differential</p> <p>2 over a student?</p> <p>3 A No, no, I'm not denying that.</p> <p>4 Q Okay. Are you denying that Dr. Rizzoni</p> <p>5 has significant power over his students?</p> <p>6 MS. CORL: Object to relevance.</p> <p>7 You can answer.</p> <p>8 A Okay. Am I not deny -- okay. So</p> <p>9 generally speaking, faculty have some form of</p> <p>10 power over students, yes. So that could -- that</p> <p>11 could apply also to this case, to Professor</p> <p>12 Rizzoni with his students.</p> <p>13 BY MR. PATTAKOS:</p> <p>14 Q So the issue really isn't your power over</p> <p>15 these students of Rizzoni's. The issue is</p> <p>16 Rizzoni's power over them; correct?</p> <p>17 A Correct.</p> <p>18 Q Okay. And you certainly understand that</p> <p>19 if a student fails out of school or is deemed to</p> <p>20 have failed out of school, that they are very</p> <p>21 likely to lose their visa if they are here on a</p> <p>22 student visa; correct?</p> <p>23 A That is correct.</p> <p>24 Q Dr. Canova, when a student goes up for a</p> <p>25 Ph.D. in mechanical engineering, they have already</p>	<p>44</p> <p>1 the student has to prepare for their dissertation;</p> <p>2 correct?</p> <p>3 A Correct.</p> <p>4 Q Basically to confirm that the student is</p> <p>5 on the right track; correct?</p> <p>6 A Very well said.</p> <p>7 Q And there is still substantial work to be</p> <p>8 done at the time of the Ph.D. candidacy exam;</p> <p>9 correct?</p> <p>10 A Yes.</p> <p>11 Q And that is to finish the project;</p> <p>12 correct?</p> <p>13 A Yes. Because the candidate's exam is a</p> <p>14 discussion of a proposal. So it's not a</p> <p>15 discussion of -- special discussion of what has</p> <p>16 already been done, but the bulk of the discussion</p> <p>17 is on the continuation of that work that should</p> <p>18 happen in the following period between the time</p> <p>19 when the candidacy exam is passed and the time</p> <p>20 where the defense exam is scheduled.</p> <p>21 Q Dr. Canova, you said that Ms. Huang's exam</p> <p>22 was unlike anything in your career.</p> <p>23 A Yes.</p> <p>24 Q How many times in your experience have</p> <p>25 students failed this candidacy examination?</p>

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<p>45</p> <p>1 A One.</p> <p>2 Q And is that my client?</p> <p>3 A That is your client.</p> <p>4 Q Dr. Canova, did it trouble you that</p> <p>5 Ms. Huang passed that same candidacy exam that you</p> <p>6 failed her for only three months later under the</p> <p>7 supervision of another one of your colleagues at</p> <p>8 Ohio State?</p> <p>9 A No, it did not.</p> <p>10 Q Why?</p> <p>11 A I found it awkward, but it did not</p> <p>12 generate any -- any troubling feeling.</p> <p>13 Q Why was it awkward?</p> <p>14 A It is possible that a student who fails a</p> <p>15 qualifying exam or arrives at a point in the</p> <p>16 Ph.D., then the student is not successful or is</p> <p>17 not --</p> <p>18 Okay. The Ph.D. program is a working</p> <p>19 relationship between a student and a mentor. And</p> <p>20 at any point of the program that relationship</p> <p>21 might not go well, so it is possible that a</p> <p>22 student who is not doing well with a professor</p> <p>23 could find another advisor and do well with the</p> <p>24 other advisor.</p> <p>25 Q Hmm. Well, if that's the case,</p>	<p>47</p> <p>1 the exam, and because of the attitude.</p> <p>2 Q Oh, okay. But you just said that</p> <p>3 sometimes it's just a student could just do better</p> <p>4 with another advisor.</p> <p>5 A Yeah, I said that.</p> <p>6 Q And Meng did do better with another</p> <p>7 advisor. Within months after having to go through</p> <p>8 the stress of reporting the sexual abuse, she was</p> <p>9 able to find another advisor in your program, a</p> <p>10 Ph.D. who teaches at the same school you teach at,</p> <p>11 through whom she demonstrated the requisite</p> <p>12 skills, abilities, attitude, if that counts, to</p> <p>13 get this done. So doesn't that show that you were</p> <p>14 faulty in your assessment that she didn't deserve</p> <p>15 a second chance?</p> <p>16 A I cannot comment on that. I can only say</p> <p>17 that, based on my professional experience, the</p> <p>18 candidate, as I mentioned earlier, was unprepared,</p> <p>19 had poor performance like the exam of her own. So</p> <p>20 I just gave what was my honest professional</p> <p>21 opinion.</p> <p>22 Q Hmmm. You're familiar with Dr. Kumar;</p> <p>23 correct?</p> <p>24 A I am.</p> <p>25 Q You don't question Dr. Kumar's integrity</p>
<p>46</p> <p>1 Dr. Canova, then why was the decision -- that was</p> <p>2 apparently supported by you -- to not even allow</p> <p>3 Meng a second chance to take the exam?</p> <p>4 A So that decision was --</p> <p>5 Q Let me strike that. Let me strike that,</p> <p>6 sir.</p> <p>7 Why was the decision not to at least give</p> <p>8 her a chance to form a working relationship with</p> <p>9 another mentor? Why -- did anyone even consider</p> <p>10 that?</p> <p>11 A I mean, I cannot speak for the other</p> <p>12 committee members, but in my case, my decision was</p> <p>13 based not just on the fact that the candidate</p> <p>14 failed the exam but in the general attitude that</p> <p>15 the candidate had towards the advisor and their</p> <p>16 committee.</p> <p>17 Q Ahh. Okay. Hmm.</p> <p>18 Well, if that's the case, Dr. Canova --</p> <p>19 well, strike that.</p> <p>20 So you didn't fail Ms. Huang because of</p> <p>21 her technical abilities or research abilities, you</p> <p>22 failed her because she had a bad attitude?</p> <p>23 A No, it was because of her lack of</p> <p>24 technical abilities, her lack of comprehension of</p> <p>25 the subject matter, her lack of preparedness for</p>	<p>48</p> <p>1 or credentials, do you?</p> <p>2 A I do not.</p> <p>3 Q Just pardon me.</p> <p>4 A Yes.</p> <p>5 MS. CORL: Are you doing okay? Do you</p> <p>6 need a break?</p> <p>7 THE WITNESS: I'm a little thirsty; but if</p> <p>8 you don't mind, I can just grab a bottle of water</p> <p>9 here.</p> <p>10 MR. PATTAKOS: That's fine. Go ahead.</p> <p>11 Let's stay on the record.</p> <p>12 THE WITNESS: Yes. Thank you.</p> <p>13 BY MR. PATTAKOS:</p> <p>14 Q Dr. Canova, I will ask you the same</p> <p>15 questions about Dr. Cao, Dr. Co, and Dr. Dai.</p> <p>16 A Okay.</p> <p>17 Q You're familiar with all of those doctors</p> <p>18 that are on the faculty in your school; correct?</p> <p>19 A Yes.</p> <p>20 Q And you do not question their integrity or</p> <p>21 credentials either, do you, sir?</p> <p>22 A I do not.</p> <p>23 Q Okay. Did you ever investigate or do</p> <p>24 anything to follow up on how or why Ms. Huang</p> <p>25 ended up passing that candidacy exam three months</p>

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<p>49</p> <p>1 later?</p> <p>2 A No.</p> <p>3 Q Did you know that Ms. Huang had a very</p> <p>4 successful relationship with the team at Ford?</p> <p>5 MS. CORL: Object to relevance.</p> <p>6 You can answer.</p> <p>7 A I knew that she did one or maybe two</p> <p>8 internships at Ford. I don't know what specific</p> <p>9 relationship she had with them or with -- who she</p> <p>10 was affiliated with.</p> <p>11 BY MR. PATTAKOS:</p> <p>12 Q Did anybody ever tell you, Dr. Canova,</p> <p>13 that during Ms. Huang's summer internship at Ford</p> <p>14 in 2017, which ended a few months before you</p> <p>15 failed her on the candidacy exam, that the Ford</p> <p>16 team said that her research project for that</p> <p>17 summer was so excellent that she was asked to</p> <p>18 present it to upper management? Did you ever find</p> <p>19 out about that?</p> <p>20 MS. CORL: Object to relevance.</p> <p>21 You can answer.</p> <p>22 A No, I don't remember.</p> <p>23 BY MR. PATTAKOS:</p> <p>24 Q Rizzoni never told you that?</p> <p>25 A No, he did not.</p>	<p>51</p> <p>1 A No. Why --</p> <p>2 Sorry. No.</p> <p>3 Q Okay. Dr. Canova, it would make sense</p> <p>4 that Ms. Huang would be defensive and awkward</p> <p>5 during her candidacy exam if she had been sexually</p> <p>6 abused by Rizzoni in the manner that she was,</p> <p>7 wouldn't it?</p> <p>8 MS. CORL: Objection, calls for</p> <p>9 speculation.</p> <p>10 You can answer.</p> <p>11 A I -- I mean, I'm -- I'm not in a position</p> <p>12 to know this answer. I'm not an expert in</p> <p>13 psychology.</p> <p>14 MR. PATTAKOS: Christina, that's more</p> <p>15 coaching and I'm going to object again. Please</p> <p>16 stop doing that.</p> <p>17 MS. CORL: I have to state the basis for</p> <p>18 my objection.</p> <p>19 MR. PATTAKOS: No, you don't.</p> <p>20 MS. CORL: One word.</p> <p>21 MR. PATTAKOS: No. Not --</p> <p>22 MS. CORL: Yes, I do.</p> <p>23 MR. PATTAKOS: Not here, you don't. You</p> <p>24 wouldn't be allowed to do that in the courtroom,</p> <p>25 and you know it.</p>
<p>50</p> <p>1 Q If that happened with one of your</p> <p>2 students, you would be very proud, wouldn't you,</p> <p>3 sir?</p> <p>4 A Yes.</p> <p>5 Q It would make your heart sing, wouldn't</p> <p>6 it?</p> <p>7 A I cannot deny that.</p> <p>8 Q I would hope you wouldn't. Thank you.</p> <p>9 Did you know that even after -- do you</p> <p>10 know that the Ford team became aware of the</p> <p>11 allegations against Rizzoni?</p> <p>12 MS. CORL: Object to relevance.</p> <p>13 You can answer.</p> <p>14 A I do not.</p> <p>15 BY MR. PATTAKOS:</p> <p>16 Q You have no idea about that?</p> <p>17 A I have no idea about that.</p> <p>18 Q Did you know that after Ms. Huang</p> <p>19 graduated with her Ph.D. from your program that</p> <p>20 she was offered employment at Ford?</p> <p>21 MS. CORL: Object to relevancy.</p> <p>22 You can answer.</p> <p>23 A I honestly don't remember.</p> <p>24 BY MR. PATTAKOS:</p> <p>25 Q Does that bother you?</p>	<p>52</p> <p>1 Anyway.</p> <p>2 BY MR. PATTAKOS:</p> <p>3 Q Dr. Canova, how do you explain on one</p> <p>4 hand -- the contrast between on one hand your</p> <p>5 assessment that Meng so lacked in the attitude and</p> <p>6 abilities to even pass her candidacy exam and even</p> <p>7 get a second chance with another faculty advisor</p> <p>8 or otherwise, with, on the other hand, the fact</p> <p>9 that she immediately passed that candidacy exam as</p> <p>10 soon as she was permitted to retake it, completed</p> <p>11 her dissertation, received her Ph.D., and was</p> <p>12 offered full-time employment with the same Ford</p> <p>13 team that you and Dr. Rizzoni worked so closely</p> <p>14 with?</p> <p>15 MS. CORL: Objection --</p> <p>16 BY MR. PATTAKOS:</p> <p>17 Q How do you explain that contrast?</p> <p>18 A I cannot possibly explain that.</p> <p>19 Q Dr. Canova, do you know that Ms. Huang's</p> <p>20 candidacy exam that she passed was the identical</p> <p>21 subject that she presented to you and Dr. Rizzoni</p> <p>22 and that first committee on?</p> <p>23 A I do not --</p> <p>24 MS. CORL: Same objection.</p> <p>25 A I do not.</p>

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<p>53</p> <p>1 BY MR. PATTAKOS:</p> <p>2 Q Do you -- would you deny that? Do you</p> <p>3 have any reason to deny that?</p> <p>4 A I'm sorry, I don't understand the</p> <p>5 question.</p> <p>6 Q Well, I'm asking if you don't know or if</p> <p>7 you just -- if you believe it's false?</p> <p>8 A And the question, if I -- may you restate</p> <p>9 your question to see if I understood?</p> <p>10 Q How about this, let me restate the</p> <p>11 question. So I'll strike the previous question.</p> <p>12 A Okay.</p> <p>13 Q Dr. Canova, do you -- would you -- do you</p> <p>14 have reason to disagree with the proposition that</p> <p>15 Meng's Ph.D. candidacy exam was on the very same</p> <p>16 subject the second time when she passed it as it</p> <p>17 was the first time when your committee failed her?</p> <p>18 A I don't know that the exam -- that the</p> <p>19 candidacy proposal was the same between the first</p> <p>20 time that she took the exam and the second time</p> <p>21 because I was not involved in any way, shape, or</p> <p>22 form with the second exam. So I can't answer the</p> <p>23 question unless I speculate.</p> <p>24 Q And you did nothing to look into it?</p> <p>25 A No.</p>	<p>55</p> <p>1 Q You also taught Meng in ME5339. Do you</p> <p>2 recall?</p> <p>3 A That's the course I do not recall. Thank</p> <p>4 you for reminding me.</p> <p>5 Q Okay. But now you remember that you did</p> <p>6 teach her in that class; correct?</p> <p>7 A I -- yeah, yeah. I teach that course</p> <p>8 every year.</p> <p>9 Q And that is Simulation Techniques For</p> <p>10 Dynamic Systems; correct?</p> <p>11 A Correct.</p> <p>12 Q Okay. And Meng -- you also awarded Meng</p> <p>13 an A in that class as well; correct?</p> <p>14 A That I don't remember.</p> <p>15 Q Okay. But you have no reason sitting here</p> <p>16 today to doubt that?</p> <p>17 A I do not have any reason to doubt that.</p> <p>18 Q Okay. For ME7383 -- correct me if I'm</p> <p>19 wrong -- (Reading:) This graduate course targets</p> <p>20 graduate engineering students or professionals who</p> <p>21 would like to receive a comprehensive and general</p> <p>22 exposure to the field of the electrochemical</p> <p>23 energy conversion and storage systems; correct?</p> <p>24 A That is correct.</p> <p>25 Q Okay. (Reading:) Particular relevance is</p>
<p>54</p> <p>1 Q Okay.</p> <p>2 A There is some degree of confidentiality of</p> <p>3 these proposals. They are visible only to the</p> <p>4 committee. So because I was not part of the</p> <p>5 second committee, I did not have any access to the</p> <p>6 proposal or I don't have any knowledge of the</p> <p>7 exam.</p> <p>8 Q Dr. Canova, you were Meng's instructor in</p> <p>9 two classes in the Ph.D. program; correct?</p> <p>10 A I do remember one, but you probably have</p> <p>11 better information than me.</p> <p>12 Q Okay. Which one do you remember?</p> <p>13 A The -- she took a battery course with me,</p> <p>14 the OSU label is ME7383.</p> <p>15 Q And ME7383 is Electrochemical Energy</p> <p>16 Conversion and Storage Systems For Automotive</p> <p>17 Applications; correct?</p> <p>18 A Yes.</p> <p>19 Q And you awarded Meng with an A in that</p> <p>20 class; correct?</p> <p>21 A Yes.</p> <p>22 Q How do you know that?</p> <p>23 A The class had six or seven homework</p> <p>24 assignments. I graded every single one of them,</p> <p>25 and Meng did very well in my course, mm-hmm.</p>	<p>56</p> <p>1 given to energy storage systems for electrified</p> <p>2 vehicles based on lithium ion technology, covering</p> <p>3 cell materials and fundamental properties, testing</p> <p>4 procedures for performance characterization,</p> <p>5 modeling and simulation, pack design, system</p> <p>6 integration, control, diagnostics, and safety;</p> <p>7 correct?</p> <p>8 A Correct.</p> <p>9 Q As for ME5339, that is a course that:</p> <p>10 Develops competence in the modeling of dynamical</p> <p>11 systems and in the use of dynamic systems</p> <p>12 simulations software for conducting system</p> <p>13 analysis and control design; correct, sir?</p> <p>14 A Yes.</p> <p>15 Q Okay. And this course is to: Integrate</p> <p>16 knowledge from multiple disciplines (statics and</p> <p>17 dynamics, thermo-fluid sciences, numerical</p> <p>18 methods, optimization, linear systems and control</p> <p>19 theory) to develop a comprehensive methodology for</p> <p>20 model development verification, implementation,</p> <p>21 calibration, verification, and application;</p> <p>22 correct?</p> <p>23 A Correct.</p> <p>24 Q Dr. Canova, you became romantically</p> <p>25 involved with your current wife when you were her</p>

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<p>57</p> <p>1 professor at Ohio State and she was your student; 2 correct? 3 MS. CORL: Object to relevance. 4 A That is not correct. 5 BY MR. PATTAKOS: 6 Q But she was your student; correct? 7 A Never. 8 Q You were her advisor? 9 A Nope. 10 Q No? But she was a student at the school? 11 A She was a student at the school. 12 Q While you were a professor. 13 A While I was a professor. 14 Q And your romantic relationship began while 15 she was a student and while you were a professor; 16 correct? 17 A No. 18 Q No? 19 A That is not correct. 20 Q What do you say in response to people who 21 say that? 22 A Our romantic relationship began in 2008, 23 when she was a visiting scholar from the Swiss 24 Federation Institute of Technology. That was the 25 same way she came -- as I came to Ohio State four</p>	<p>59</p> <p>1 MR. PATTAKOS: Is that going to come up on 2 screen, or -- 3 THE WITNESS: I don't see anything. 4 TRIAL TECHNICIAN: Yes, it is. Just give 5 me one moment. 6 MR. PATTAKOS: Okay. Yeah, take your 7 time. 8 TRIAL TECHNICIAN: Can everyone see my 9 screen? 10 MS. CORL: Yep. I can. Can you see it 11 okay? 12 THE WITNESS: Yeah. 13 TRIAL TECHNICIAN: Please let me know if 14 you'd like me to zoom in or zoom out. 15 BY MR. PATTAKOS: 16 Q Dr. Canova, have you seen this document 17 before? 18 A Yes. 19 Q When have you seen this document? 20 A I believe it was when -- I am trying to -- 21 I'm sorry, I'm trying to reconstruct from the 22 context. 23 I believe that was after I received the 24 candidacy proposal and before we had scheduled the 25 oral exam.</p>
<p>58</p> <p>1 years prior. I was a postdoctoral researcher at 2 the Center. So I was not a faculty and she was 3 not a student of Ohio State. 4 Q So your relationship pre-dated. 5 A Yes. 6 Q Okay. I understand. Thank you. 7 A Absolutely. 8 Q I wish you two the best. I hope you have 9 a great honeymoon. 10 Let's take five -- let's take five 11 minutes. I think I'm done, I just need a 12 five-minute break to confirm. 13 THE VIDEOGRAPHER: Great. Please stand 14 by. I'll take us off the record. We're going off 15 the record and the time is 5:25 p.m. 16 (Recess taken, 5:25 p.m. to 5:32 p.m. EDT) 17 THE VIDEOGRAPHER: We are going back on 18 the record and the time is 5:32 p.m. 19 BY MR. PATTAKOS: 20 Q Okay. I realized that I had not gone 21 through these documents yet. I will get through 22 them as quickly as we can. 23 Let's show Exhibit 1 to the witness, 24 please. 25 (Canova Deposition Exhibit 1 marked.)</p>	<p>60</p> <p>1 Yeah, yeah. 2 Q Okay. Well, you testified that you never 3 spoke with Rizzoni about how the exam should come 4 out. That's what -- that was your testimony when 5 Christina was asking you questions. Do you 6 remember that? 7 A She said, and I responded no, the question 8 did at any point in time Professor Rizzoni ask me 9 to fail the candidate, I believe. 10 Q Yeah. And you said that Rizzoni never 11 expressed any opinion about that. And you also 12 said that Rizzoni -- that you and Rizzoni never 13 talked about how the exam should come out. 14 Are you changing your testimony now? 15 A No. I under -- I intended that should 16 come out is equal to fail or pass. 17 Q Okay. Well, let's go through this 18 document. And what we see at the bottom of the 19 page is -- the bottom of the first page here is an 20 e-mail from Meng dated December 1st, 2017. Do you 21 see that? And she's e-mailing Rizzoni, you, and 22 the rest of the committee; correct? 23 A Yeah, I -- 24 MS. CORL: Can you make that bigger? We 25 can't see it.</p>

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<p>61</p> <p>1 THE WITNESS: And scroll down.</p> <p>2 MS. CORL: And go down. There you go.</p> <p>3 THE WITNESS: Thank you. Yeah.</p> <p>4 BY MR. PATTAKOS:</p> <p>5 Q And if you scroll down to the second page,</p> <p>6 you can see it's an e-mail from Meng.</p> <p>7 Go ahead and go to the second page. And</p> <p>8 it says: Dear professors, Thank you all very much</p> <p>9 for your commitment to serve as committee members</p> <p>10 for my candidacy exam. Please find my</p> <p>11 dissertation proposal and written exam as</p> <p>12 attached. Looking forward to meeting you next</p> <p>13 Friday, etc. Correct?</p> <p>14 A Yes.</p> <p>15 Q And then if we scroll up to the next</p> <p>16 e-mail --</p> <p>17 You received that e-mail from Meng;</p> <p>18 correct?</p> <p>19 A I did.</p> <p>20 Q And then we see Rizzoni responds to that</p> <p>21 e-mail; correct?</p> <p>22 A May I read?</p> <p>23 Q Yes. Rizzoni is e-mailing you on top of</p> <p>24 Meng's e-mail in response to Meng's e-mail;</p> <p>25 correct?</p>	<p>63</p> <p>1 So Giorgio prepared the questions. He</p> <p>2 provided the questions to the student, and the</p> <p>3 student answered those question on a document,</p> <p>4 then both documents were attached.</p> <p>5 At least that's what should be, hopefully.</p> <p>6 Q Okay. Well, what's the next line, "there</p> <p>7 will not be a presentation." Why would he need to</p> <p>8 qualify that? What does he mean by that?</p> <p>9 A So the standard -- the procedure for a</p> <p>10 candidacy exam is such that the candidate is --</p> <p>11 the questioning -- or the -- sorry, the</p> <p>12 questions -- is not a trial. The questions start</p> <p>13 right at the beginning of the exam. And I'll tell</p> <p>14 you, this job takes about two hours.</p> <p>15 In some circumstances, as a courtesy to</p> <p>16 the candidate, the candidate is -- has -- I mean,</p> <p>17 the candidate might prepare a very short</p> <p>18 presentation, probably five minutes. That</p> <p>19 might or may not be given to the committee with</p> <p>20 just the purpose of refreshing the memory of the</p> <p>21 committee members on what the exam is about.</p> <p>22 Q And that courtesy was not extended to Meng</p> <p>23 here.</p> <p>24 A No.</p> <p>25 Q Why not?</p>
<p>62</p> <p>1 A Yes.</p> <p>2 Q And that is on December 7th at 7:27 a.m.,</p> <p>3 about six days after Meng sent you the e-mail;</p> <p>4 correct?</p> <p>5 A That's correct, yes.</p> <p>6 Q And Rizzoni says -- I'm sorry, I have</p> <p>7 not -- we haven't cleared this up.</p> <p>8 Is it Mar-chell-oe or Mar-sell-oe?</p> <p>9 A Oh, yeah. Yeah, no problem. It's</p> <p>10 Mar-chell-oe.</p> <p>11 Q Okay, great.</p> <p>12 Marcello, please kindly take the time to</p> <p>13 review the dissertation proposal document as well</p> <p>14 as the written exam question and answer in advance</p> <p>15 of tomorrow's exam.</p> <p>16 Am I reading that correctly?</p> <p>17 A Yes.</p> <p>18 Q Why is question and answer underlined</p> <p>19 there, do you know?</p> <p>20 A Yes, I do remember.</p> <p>21 The exam contained two attachment. I</p> <p>22 think the e-mail below may be -- or maybe not.</p> <p>23 There is one or two attachments to that. One was</p> <p>24 the proposal and one was a written exam where</p> <p>25 there was a list of questions and answers.</p>	<p>64</p> <p>1 A The process -- the procedure as per the</p> <p>2 graduate school is that there should -- the</p> <p>3 examinee does not have any presentation.</p> <p>4 Q Hmm, okay.</p> <p>5 Rizzoni proceeds to say: This student has</p> <p>6 been a challenge, especially this semester. I</p> <p>7 have only seen her twice between September and</p> <p>8 now, not for lack of trying or availability on my</p> <p>9 part. I have two other students going through</p> <p>10 candidacy this semester and I have met with them</p> <p>11 more than once a week for the entire semester.</p> <p>12 Am I reading that correctly?</p> <p>13 A Yes.</p> <p>14 Q You would agree, Dr. Canova, that you meet</p> <p>15 with some of your students more than you meet with</p> <p>16 other students depending on the particular</p> <p>17 student; correct?</p> <p>18 A Correct.</p> <p>19 Q Okay. Some students need more meetings</p> <p>20 than other students; correct?</p> <p>21 A Right.</p> <p>22 Q Okay. Rizzoni goes on to say: I would</p> <p>23 like this exam to be a real exam.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>

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<p>65</p> <p>1 Q What does that mean?</p> <p>2 MS. CORL: Objection.</p> <p>3 You can answer.</p> <p>4 A Yeah. I will have to speculate in this</p> <p>5 case, that he wanted the exam to be conducted in a</p> <p>6 rigorous manner, and in a -- in a -- pretty</p> <p>7 thoroughly.</p> <p>8 BY MR. PATTAKOS:</p> <p>9 Q Well -- but that doesn't make sense, does</p> <p>10 it? Because you are -- you are a Ph.D. professor</p> <p>11 at the Ohio State University, Mechanical</p> <p>12 Engineering and Aerospace Engineering School.</p> <p>13 Everything you do is in a rigorous manner and</p> <p>14 thorough. Isn't that true, sir?</p> <p>15 A It is true.</p> <p>16 Q So can you come up with some other</p> <p>17 speculation about what he meant by that?</p> <p>18 MS. CORL: Objection.</p> <p>19 A Yeah, I don't know how to answer.</p> <p>20 BY MR. PATTAKOS:</p> <p>21 Q Okay. How about "the outcome will be</p> <p>22 whatever it needs to be." What does that mean?</p> <p>23 A Yeah.</p> <p>24 MS. CORL: Same objection.</p> <p>25 A Mm-hmm. That I also found odd.</p>	<p>67</p> <p>1 A I did not.</p> <p>2 Q Hmm. You remember that specifically?</p> <p>3 A There is -- he said that pretty clearly on</p> <p>4 his statement, "we are on the same page," which I</p> <p>5 interpreted as we don't need to talk.</p> <p>6 Q We have -- and that was at 1 o'clock p.m.,</p> <p>7 about five hours later?</p> <p>8 A Yes.</p> <p>9 Q Hmm. So how did Rizzoni know you were on</p> <p>10 the same page?</p> <p>11 MS. CORL: Objection.</p> <p>12 A He couldn't -- I -- I don't know. I'm not</p> <p>13 him.</p> <p>14 BY MR. PATTAKOS:</p> <p>15 Q Hmm. Well, you said, "I need to talk to</p> <p>16 you to make sure we are on the same page."</p> <p>17 And Rizzoni seemingly disregards that as</p> <p>18 if he knows what page you're on.</p> <p>19 A In this, says the same page, it was sort</p> <p>20 of a polite way or my personal way at the time to</p> <p>21 express concern that what I received from</p> <p>22 Ms. Huang was actually not, you know, what we</p> <p>23 expected in terms of the level of preparedness for</p> <p>24 this exam, and I was really worried that she was</p> <p>25 not prepared to do the qualifying exam. That's my</p>
<p>66</p> <p>1 BY MR. PATTAKOS:</p> <p>2 Q Mm-hmm. Okay.</p> <p>3 A So may I clarify one point?</p> <p>4 Q Sure.</p> <p>5 A Sorry. So, let's see. Yeah, the entire</p> <p>6 exam, you know, was not ordinary situation,</p> <p>7 because, again, as I mentioned earlier, on the</p> <p>8 surprising level of unpreparation of the</p> <p>9 candidate, I feel like Giorgio was compelled to</p> <p>10 write those statements in the message, I guess.</p> <p>11 Q Hmm. Okay.</p> <p>12 Okay. Let's move onto the e-mail of --</p> <p>13 let's move above this e-mail.</p> <p>14 You write back to Rizzoni that same day;</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q Okay. And you say: Giorgio, I did</p> <p>18 already read these. Quite honestly I found them</p> <p>19 disappointing. I need to talk to you before</p> <p>20 tomorrow just to make sure we are on the same</p> <p>21 page.</p> <p>22 Am I reading that correctly?</p> <p>23 A You are.</p> <p>24 Q Okay. Did you end up talking with</p> <p>25 Rizzoni?</p>	<p>68</p> <p>1 clumsy way of stating that in an e-mail which, six</p> <p>2 years later, I would probably have phrased in a</p> <p>3 different way.</p> <p>4 Q Hmm. So Rizzoni was able to infer all of</p> <p>5 that from you saying that you found her responses</p> <p>6 disappointing and that he needs to talk to you</p> <p>7 tomorrow -- before tomorrow -- or that you need to</p> <p>8 talk to him before tomorrow.</p> <p>9 MS. CORL: Objection.</p> <p>10 You can answer.</p> <p>11 MR. PATTAKOS: I'll withdraw it.</p> <p>12 BY MR. PATTAKOS:</p> <p>13 Q So why did you need to make sure you were</p> <p>14 on the same page with Rizzoni? What did you want</p> <p>15 to make sure you were on the same page about?</p> <p>16 A I was worried that with the written exam</p> <p>17 that Ms. Huang presented to the committee, she</p> <p>18 would have almost certainly failed the oral.</p> <p>19 Q Mm-hmm. Why didn't you --</p> <p>20 A And --</p> <p>21 Q Oh, go on.</p> <p>22 A Please, go ahead.</p> <p>23 Q Complete your answer, sir. Please.</p> <p>24 A Yeah, I was worried that she was going to</p> <p>25 fail. I was genuinely worried that she was going</p>

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<p>69</p> <p>1 to fail.</p> <p>2 Q Huh.</p> <p>3 A It was not my intention to fail, but I was</p> <p>4 worried --</p> <p>5 You know, as a professor, as you've</p> <p>6 stated, I've had Ms. Huang in two classes and she</p> <p>7 did very well in both. So you may imagine my</p> <p>8 surprise when I saw that proposal come and that --</p> <p>9 and that exam coming from her, and I was worried</p> <p>10 that with this level of the content, she was going</p> <p>11 to fail the exam.</p> <p>12 Q Mm-hmm. That's troubling, isn't it?</p> <p>13 A It is troubling.</p> <p>14 Q Okay, Dr. Canova, so what did you do to</p> <p>15 address those concerns?</p> <p>16 A I wrote that e-mail.</p> <p>17 Q And then what?</p> <p>18 A And then Giorgio responded, and I believe</p> <p>19 that the next interaction I had with him was</p> <p>20 during the exam.</p> <p>21 Q Okay. Well, do you have any regrets about</p> <p>22 that?</p> <p>23 A About what?</p> <p>24 Q About the way you proceeded here with your</p> <p>25 worries.</p>	<p>71</p> <p>1 BY MR. PATTAKOS:</p> <p>2 Q And you didn't question that?</p> <p>3 A I mean, I was not certainly happy to walk</p> <p>4 into that room and do the exam.</p> <p>5 Q But you did it anyway?</p> <p>6 A Yes. That's what I was supposed to do.</p> <p>7 That was my job.</p> <p>8 Q Okay. Let's go on to Exhibit 2.</p> <p>9 MS. CORL: Can you make that bigger?</p> <p>10 There you go.</p> <p>11 (Canova Deposition Exhibit 2 marked.)</p> <p>12 MR. PATTAKOS: Why don't you scroll all</p> <p>13 the way to the bottom.</p> <p>14 Oh, I see. That's it. Okay. That is the</p> <p>15 bottom. Thank you.</p> <p>16 [Document review.]</p> <p>17 BY MR. PATTAKOS:</p> <p>18 Q This is an e-mail from Rizzoni at the</p> <p>19 bottom that says: All. Janeen and I just met</p> <p>20 with Meng. Janeen is taking it from here. I</p> <p>21 spoke to Janeen at length before Meng came and we</p> <p>22 concur that it does not make sense to give her a</p> <p>23 second chance, so I will vote to not allow a</p> <p>24 second exam.</p> <p>25 Am I reading that correctly?</p>
<p>70</p> <p>1 A Well, if I could come back, I would</p> <p>2 have -- I would have never allowed that exam to</p> <p>3 happen.</p> <p>4 Q Dr. Canova, if you were worried that Meng</p> <p>5 was going to fail the exam, you could have told</p> <p>6 her that; correct? And the exam could have been</p> <p>7 postponed; correct?</p> <p>8 A The exam could have been postponed, yes.</p> <p>9 Q Did you ever talk to Rizzoni about that</p> <p>10 possibility before you went ahead and proceeded</p> <p>11 with that exam?</p> <p>12 A No, we didn't talk.</p> <p>13 Q Did you talk with anybody about the</p> <p>14 possibility of postponing this exam to address</p> <p>15 your worries?</p> <p>16 A I honestly do not remember.</p> <p>17 Q Rizzoni responds and tells you: Be tough;</p> <p>18 right?</p> <p>19 A Yes.</p> <p>20 Q What did that mean to you?</p> <p>21 A May I --</p> <p>22 MS. CORL: Objection.</p> <p>23 Go ahead.</p> <p>24 A May I -- it would be my interpretation is</p> <p>25 to proceed with the exam.</p>	<p>72</p> <p>1 A Yes.</p> <p>2 Q Did you receive that e-mail?</p> <p>3 A Yes, I think so.</p> <p>4 Q Okay.</p> <p>5 A Yeah, I think so. Yes, I did.</p> <p>6 Q Okay. Let's -- this Exhibit 2 is</p> <p>7 superfluous. Strike it. I'm going to mark a new</p> <p>8 Exhibit 2. This is my fault.</p> <p>9 Actually, let's just mark Exhibit 3. This</p> <p>10 is -- this can be Exhibit 3. This was</p> <p>11 duplicative.</p> <p>12 Let's go ahead and look at Exhibit 3,</p> <p>13 because it's the same e-mail and then you actually</p> <p>14 respond to it.</p> <p>15 (Canova Deposition Exhibit 3 marked.)</p> <p>16 BY MR. PATTAKOS:</p> <p>17 Q Okay. Does that refresh your</p> <p>18 recollection?</p> <p>19 A Yes. Thank you.</p> <p>20 Q And you said: Dear Giorgio, Thank you. I</p> <p>21 will finalize my vote as unsatisfactory on grad</p> <p>22 forms.</p> <p>23 A Yes.</p> <p>24 Q And Rizzoni responds on December -- and</p> <p>25 you sent this e-mail on December 11th? All three</p>

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<p>73</p> <p>1 of these e-mails are on December 11th; correct?</p> <p>2 A Yes.</p> <p>3 Q And you respond -- Rizzoni responded to</p> <p>4 your e-mail: And check the correct second chance</p> <p>5 box.</p> <p>6 A Okay.</p> <p>7 Q Am I reading that correctly?</p> <p>8 A Yes.</p> <p>9 Q And do you remember what you responded</p> <p>10 after that?</p> <p>11 A I believe I went ahead and I finalized the</p> <p>12 vote as unsatisfactory.</p> <p>13 Q But you didn't have the option to check</p> <p>14 the second chance box; correct?</p> <p>15 A I did have the option to check the second</p> <p>16 chance box.</p> <p>17 Q So you were part of the decision to not</p> <p>18 check -- you were part of the decision to not</p> <p>19 allow her the second chance?</p> <p>20 A Yes.</p> <p>21 Q But ultimately that was Rizzoni's</p> <p>22 decision, was it not, sir?</p> <p>23 A Yes, it was. The process was -- the</p> <p>24 process was really out of the normal,</p> <p>25 unfortunately, at that point, mm-hmm.</p>	<p>75</p> <p>1 exam. And so it was kind of a new experience for</p> <p>2 all of us, and so we honestly didn't really know</p> <p>3 what to do.</p> <p>4 During the conversation, Professor Rizzoni</p> <p>5 asked us to provide a written statement to each of</p> <p>6 us that documented what was our personal feedback</p> <p>7 on the exam.</p> <p>8 And then he mentioned that, on the</p> <p>9 following week, I believe it was that Monday, he</p> <p>10 would have had a meeting with the advisee and</p> <p>11 Ms. Janeen Sands to discuss whether to -- whether</p> <p>12 the exam -- at that point we -- I provided a</p> <p>13 failing evaluation. And he would have discussed</p> <p>14 the case with Janeen, who at the time was the</p> <p>15 graduate program administrator in our department.</p> <p>16 MR. PATTAKOS: I'm sorry, I will ask for</p> <p>17 the exhibit to be taken down.</p> <p>18 Thank you.</p> <p>19 BY MR. PATTAKOS:</p> <p>20 Q Dr. Canova, the fact that this was such a</p> <p>21 unique situation, to have a student fail the Ph.D.</p> <p>22 candidacy exam, wouldn't it follow that it would</p> <p>23 be all the more appropriate to offer a second</p> <p>24 chance?</p> <p>25 A I don't have any -- I mean, in gen -- I</p>
<p>74</p> <p>1 Q How many conversations did you have with</p> <p>2 Dr. Rizzoni or any of the committee members about</p> <p>3 whether to allow Meng a second chance to pass this</p> <p>4 exam?</p> <p>5 A I believe that conversation happened, I</p> <p>6 remember, after the exam finished.</p> <p>7 Q How many conversations did you have about</p> <p>8 it?</p> <p>9 A It was one.</p> <p>10 Q One?</p> <p>11 And that was with you and all of the</p> <p>12 committee members including Rizzoni?</p> <p>13 A Yes.</p> <p>14 Q How long was that conversation?</p> <p>15 A I -- I do not remember, I'm sorry.</p> <p>16 It was probably the 15, 20 minutes maybe.</p> <p>17 Again, I'm not sure.</p> <p>18 Q Okay. And in 15 to 20 minutes, you all</p> <p>19 agreed that you weren't going to give Meng a</p> <p>20 second chance?</p> <p>21 A So I remember that during the conversation</p> <p>22 we were kind of shocked of the way the exam went,</p> <p>23 and we expressed that. And again, this is a very</p> <p>24 unusual circumstance, because I've personally</p> <p>25 never failed a student who does the candidacy</p>	<p>76</p> <p>1 don't have an opinion on this. It -- again, my</p> <p>2 response would be it depends on the candidate. It</p> <p>3 depends on the student. I mean, it's on a</p> <p>4 case-by-case basis.</p> <p>5 Q But you admitted yourself, Dr. Canova,</p> <p>6 that sometimes under a different advisor a student</p> <p>7 can do much better; correct?</p> <p>8 A I did.</p> <p>9 Q Okay. And all else equal, it is the</p> <p>10 general policy to give a second chance; correct?</p> <p>11 A There is no such general policy. It's a</p> <p>12 discussion of the committee.</p> <p>13 Q Okay. Well, you would agree that when a</p> <p>14 student comes all the way from the other side of</p> <p>15 the world, comes on a visa, has distinguished</p> <p>16 themselves with their studies so much that they</p> <p>17 get into this program, and they then complete</p> <p>18 enough of the program, including by getting As in</p> <p>19 your courses, and get to the point where they're</p> <p>20 ready to proceed with their dissertation, that</p> <p>21 there is a lot of work invested at that point and</p> <p>22 a lot of capital invested at that point; correct?</p> <p>23 A Of course. There is also -- it's also</p> <p>24 very -- there is also very big emotional component</p> <p>25 to that, because the student and advisor have</p>

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<p style="text-align: right;">77</p> <p>1 already worked for a good part of three years, and</p> <p>2 so there is a lot of effort invested on both ends,</p> <p>3 both the faculty and the student into this</p> <p>4 relationship.</p> <p>5 Q So what would be a good reason to not</p> <p>6 press pause to see if this situation could be</p> <p>7 salvaged as opposed to simply cutting the cord</p> <p>8 after a 15-minute meeting?</p> <p>9 MS. CORL: Objection.</p> <p>10 You can answer.</p> <p>11 A So it was not just after a 15-minute</p> <p>12 meeting where -- let's not forget that there was</p> <p>13 an hour and 45 minutes of exam prior to that, plus</p> <p>14 the committee reading the written reports of</p> <p>15 Ms. Huang.</p> <p>16 BY MR. PATTAKOS:</p> <p>17 Q Mm-hmm.</p> <p>18 A So it was two hours of exam at least, plus</p> <p>19 all of the time that each of us spent reading that</p> <p>20 report.</p> <p>21 Q Mm-hmm.</p> <p>22 A But during that -- just to your question,</p> <p>23 during those 15 to 20 minutes, I honestly remember</p> <p>24 that it was a shocking moment for everybody.</p> <p>25 Nobody -- you know, for the first minute or two</p>	<p style="text-align: right;">79</p> <p>1 this exam.</p> <p>2 Q To such an extent that it was not even</p> <p>3 worth considering whether there were personal</p> <p>4 problems?</p> <p>5 A Things have changed a lot more since then.</p> <p>6 Now we're getting a lot more training in, you</p> <p>7 know, understanding potential situations, and</p> <p>8 we're definitely a bit more aware because of this</p> <p>9 case. That makes you a lot more aware of the</p> <p>10 situation.</p> <p>11 But when we did that exam, nobody had any</p> <p>12 slightest thought that the reason the candidate</p> <p>13 behaved the way she did was because of the, you</p> <p>14 know, alleged inappropriate relationship. Because</p> <p>15 again, going back to what I said earlier,</p> <p>16 everybody knew Professor Rizzoni, his records with</p> <p>17 students, his, you know, professional liaison and</p> <p>18 the way he's liked by peers and his students.</p> <p>19 Q Dr. Canova --</p> <p>20 A There's no reason for us to believe it.</p> <p>21 Q Dr. Canova, at that point, those</p> <p>22 allegations hadn't even surfaced, had they?</p> <p>23 A No. They --</p> <p>24 Q So -- so --</p> <p>25 A -- surfaced after --</p>
<p style="text-align: right;">78</p> <p>1 nobody really knew what to say or what to do</p> <p>2 because, as I mentioned, nobody really faced the</p> <p>3 situation where a student presented themselves</p> <p>4 into this exam in a way that was unprepared and</p> <p>5 unprofessional.</p> <p>6 We never honestly had to face a situation</p> <p>7 like this.</p> <p>8 Q Mm-hmm. And nobody seemed to consider</p> <p>9 whether it was worth stopping to give some time to</p> <p>10 consider whether there was something going on in</p> <p>11 the student's personal life that would have led to</p> <p>12 a bad day or a bad performance on this initial</p> <p>13 exam?</p> <p>14 A That's a very good question.</p> <p>15 You know, the -- I -- from the way that</p> <p>16 the exam unfolded, you know, clearly we knew that</p> <p>17 there was something that was not happening</p> <p>18 properly. But it was the conduct of the candidate</p> <p>19 that surprised everybody, because it was -- it</p> <p>20 was, again, confrontational. It was -- she was</p> <p>21 dismissive, and she was not interested in</p> <p>22 responding to the question of the committee.</p> <p>23 So personally, I did not think that there</p> <p>24 was another component rather than the attitude of</p> <p>25 the candidate and the unpreparedness that led to</p>	<p style="text-align: right;">80</p> <p>1 Q Yes. So take the accusations off the</p> <p>2 table, sir. For all you knew, she was struggling</p> <p>3 for some other reason. A relative might have</p> <p>4 died. She could be abused by her boyfriend or</p> <p>5 anyone else. Right?</p> <p>6 Did you ever stop to consider that? That</p> <p>7 she was struggling with some serious personal</p> <p>8 problem that was impacting her performance,</p> <p>9 whether it was Rizzoni or not? It could have been</p> <p>10 any of a number of things; right?</p> <p>11 A We did not stop the exam to ask</p> <p>12 specifically that question, but we did ask -- we</p> <p>13 did -- we did try to give the candidate many, many</p> <p>14 chances to respond correctly to the questions.</p> <p>15 Just like you're doing today with me,</p> <p>16 you're being very helpful in rephrasing your</p> <p>17 questions so that I can understand and, you know,</p> <p>18 we can move forward. That's sort of the same</p> <p>19 conduct that we tried to do with the exam.</p> <p>20 You know, most of the -- the 99.9% of the</p> <p>21 candidacy exams, the committees try to help the</p> <p>22 students in filling gaps in their knowledge and</p> <p>23 their understanding of the problem, and it's a</p> <p>24 back-and-forth conversation. This time we --</p> <p>25 there was no connection and no responsiveness from</p>

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<p>81</p> <p>1 the student to the suggestions of the questions</p> <p>2 and the corrections of the committee.</p> <p>3 Q Okay. Was the candidacy exam recorded?</p> <p>4 A No.</p> <p>5 Q Why not?</p> <p>6 A The University does not require it, and we</p> <p>7 typically do not record it.</p> <p>8 Q Hmm. Okay. The one good thing about this</p> <p>9 deposition is it's recorded.</p> <p>10 A Maybe we should do it.</p> <p>11 Q Mm-hmm. Well, okay. Dr. Canova, so I --</p> <p>12 I guess, you know, you had testified before that</p> <p>13 you were struggling to understand how a student</p> <p>14 could come this far, including by performing so</p> <p>15 well in your classes, and then have this meltdown</p> <p>16 at the -- or this alleged meltdown during this</p> <p>17 candidacy exam. Am I understanding that you all</p> <p>18 concluded immediately within your 15-minute</p> <p>19 conversation after this two-hour candidacy exam</p> <p>20 that this student had such irredeemable character</p> <p>21 flaws that she was just unsalvageable and it</p> <p>22 wasn't even worth considering?</p> <p>23 A No, it wasn't like that. As far as I knew</p> <p>24 and the committee knew, that Dr. Rizzoni was</p> <p>25 struggling with this candidate. As I mentioned</p>	<p>83</p> <p>1 A Yes, I heard your question, and to be --</p> <p>2 again, the -- the way the exam finished was not</p> <p>3 the way the exam should finish in a normal</p> <p>4 candidacy exam. The policy that we have at the</p> <p>5 University are that each committee member</p> <p>6 expresses an individual evaluation, independent</p> <p>7 evaluation on the candidate. We didn't -- we were</p> <p>8 not supposed to discuss together, but we ended up</p> <p>9 discussing. We ended up writing our report, which</p> <p>10 we usually don't do, and then we ended up sending</p> <p>11 that report to Dr. Rizzoni and making a deferred</p> <p>12 decision on what was going to be the outcome of</p> <p>13 the exam. That whole procedure was unusual</p> <p>14 because the exam itself was unusual.</p> <p>15 Q And no one thought to suggest that maybe</p> <p>16 Meng should get a second chance with a different</p> <p>17 advisor.</p> <p>18 MS. CORL: Objection, asked and answered.</p> <p>19 You can answer again.</p> <p>20 A No.</p> <p>21 MR. PATTAKOS: Okay. Let's take a look at</p> <p>22 the last exhibit, Exhibit 4.</p> <p>23 (Canova Deposition Exhibit 4 marked.)</p> <p>24 BY MR. PATTAKOS:</p> <p>25 Q And let me ask you first --</p>
<p>82</p> <p>1 earlier in my deposition, he was mentioning to</p> <p>2 colleagues then that she was defiant of his</p> <p>3 advice, she was not showing up at meetings, and</p> <p>4 that in his experience he had never had to deal</p> <p>5 with such a difficult case.</p> <p>6 Then we made our -- one of our own -- our</p> <p>7 evaluation, independent, based on what the student</p> <p>8 provided to us, so that e-mail was the student</p> <p>9 directly e-mailing to us, not through</p> <p>10 Professor Rizzoni.</p> <p>11 So -- and then you could see, you know, in</p> <p>12 that exhibit that I was concerned already that the</p> <p>13 student was not prepared enough for the exam.</p> <p>14 Then we go into the exam and it was a</p> <p>15 pretty shocking moment for everyone. And then</p> <p>16 there was the 15 minutes.</p> <p>17 So it was not just based on those</p> <p>18 15 minutes. It was a very long build-up that</p> <p>19 terminated with those 15 minutes.</p> <p>20 Q Well, I heard you say that before, but I</p> <p>21 guess what I'm asking is what happened, you know,</p> <p>22 after the exam itself happened. And I'm asking</p> <p>23 about the process of deliberating as to whether</p> <p>24 she was going to get a second chance or simply be</p> <p>25 essentially expelled from the program.</p>	<p>84</p> <p>1 MR. PATTAKOS: Actually, sorry, take that</p> <p>2 down, please. I'm sorry.</p> <p>3 My apologies.</p> <p>4 BY MR. PATTAKOS:</p> <p>5 Q Dr. Canova, who is Janeen Sands? What are</p> <p>6 her credentials?</p> <p>7 A So she was the graduate studies</p> <p>8 coordinator in the Department of Mechanical</p> <p>9 Aerospace and Engineering. So in the</p> <p>10 administration. She's a staff position, and her</p> <p>11 duties are to report to the department chair and</p> <p>12 the graduate studies committee on also all methods</p> <p>13 that have to do with student registration and all</p> <p>14 of the clerical and administrative aspects that</p> <p>15 are involved in the master's and Ph.D. programs.</p> <p>16 Sorry, the program coordinator also</p> <p>17 records and suggests often options to faculty</p> <p>18 regarding scheduling the exams, regarding courses,</p> <p>19 and so on. So she's pretty supportive and helpful</p> <p>20 for all questions related to the administrative</p> <p>21 side of graduate programs.</p> <p>22 Q Is she a Ph.D.?</p> <p>23 A No.</p> <p>24 Q Is she an engineer?</p> <p>25 A No.</p>

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<p>85</p> <p>1 Q Okay. So she's not qualified to evaluate 2 Meng's candidacy exam, is she? 3 A She is not qualified to evaluate but she 4 is familiar with the University rules and the 5 policies regarding the conduct of an exam. 6 Q I understand. Okay. 7 A So it's not technical. Yeah, sorry. 8 Thank you. 9 Q Okay. Thank you. Let's go back to 10 Exhibit 4. 11 I'm losing my sunlight here, so excuse me. 12 MS. CORL: Can you make that a little bit 13 bigger? 14 BY MR. PATTAKOS: 15 Q Okay. And this is the one I want to see. 16 This -- this is an e-mail from Dr. Rizzoni to 17 Janeen Sands dated December 10, 2017. And I want 18 to look at the second paragraph where Rizzoni 19 writes -- 20 And, sir, this was just the day after the 21 exam; correct? 22 A Yes. 23 Q Okay. 24 A No, two days. 25 Q Two days. So the exam happened on Friday,</p>	<p>87</p> <p>1 that a student could do next to nothing of 2 relevance to such dissertation research and yet 3 pass a -- for a full year, and then pass a Ph.D. 4 candidacy exam three months later on the same 5 research? 6 A To me, personally doesn't make much sense. 7 Q It doesn't, does it? 8 A Speculating, everything is possible. 9 Q Does it make sense to you, Dr. Canova -- 10 well, would it surprise you that Meng's research 11 that she did at Ford that summer of 2017 12 substantially overlapped with her Ph.D. candidacy 13 exam and eventual dissertation that was approved? 14 MS. CORL: Object to relevance. 15 You can answer. 16 A So I did not know anything of the research 17 she did with Ford, because that is Ford 18 confidential, so I don't have that privilege of 19 understanding. 20 BY MR. PATTAKOS: 21 Q Mm-hmm. 22 A My -- you know, my negative evaluation is 23 based solely on what I saw and, you know, what I 24 saw was unsatisfactory. 25 (Clarification by reporter.)</p>
<p>86</p> <p>1 December 8th; correct? 2 A I believe so. 3 Q Okay. So this is two days after the exam. 4 And Rizzoni says: The exam -- 5 This is the second paragraph of his e-mail 6 to Janeen. 7 The exam did not go well at all. Meng was 8 unprepared and argumentative, and the committee 9 determined that she is really not qualified and 10 that her attitude is not consistent with the 11 expectations we place on Ph.D. students. My 12 assessment is that she has done next to nothing of 13 relevance to her dissertation research for the 14 past year. 15 Am I reading that correctly? 16 A You are. 17 Q Okay. Was that your assessment as well? 18 A The second paragraph? What you read? 19 Q In particular, was it your assessment that 20 Meng has done -- 21 A Yes. 22 Q -- next to nothing of relevance to her 23 dissertation research for the past year? 24 A Yes, I did agree with that statement. 25 Q Does it make sense to you, Dr. Canova,</p>	<p>88</p> <p>1 A I apologize for my accent. 2 BY MR. PATTAKOS: 3 Q No need to apologize to me for that. My 4 father had a very thick accent as well. 5 Okay. We can move on. 6 Dr. Canova, you know Dyche Anderson; 7 correct? 8 A Yes. 9 Q And you work closely with him, correct? 10 A Not close to him personally, but we know 11 each other professionally. 12 Q And you've worked with him over the years; 13 correct? 14 A Not directly, but I did have indirect 15 collaborations. 16 Q Does it surprise you that Dyche Anderson, 17 at his deposition, sung Meng's praises and 18 effusively the work that she did as well as her 19 work ethic and her attitude? 20 MS. CORL: Object to relevance. 21 You can answer. 22 A Honestly, I don't -- it would not surprise 23 me. It is very possible that, you know, for Dyche 24 Anderson's standards, she worked to his 25 satisfaction. I -- but again, it's a conjecture.</p>

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<p>89</p> <p>1 I'm sorry.</p> <p>2 BY MR. PATTAKOS:</p> <p>3 Q Well, do you think Dyche has low</p> <p>4 standards?</p> <p>5 MS. CORL: Object to relevancy.</p> <p>6 You can answer.</p> <p>7 A I do not.</p> <p>8 BY MR. PATTAKOS:</p> <p>9 Q And the work that Dyche Anderson does with</p> <p>10 Ph.D.s like Meng is not simple, easy work, is it,</p> <p>11 sir?</p> <p>12 A Sorry, would you mind repeating the</p> <p>13 question?</p> <p>14 Q The work that Dyche Anderson does with</p> <p>15 Ph.D. candidates like Meng is not simple, easy</p> <p>16 work, is it?</p> <p>17 MS. CORL: Object to relevance.</p> <p>18 You can answer.</p> <p>19 A As I said, not knowing the details of the</p> <p>20 work, I don't feel confident that I can express an</p> <p>21 opinion.</p> <p>22 MR. PATTAKOS: I believe that -- okay.</p> <p>23 BY MR. PATTAKOS:</p> <p>24 Q Dr. Canova, I'm looking at a document</p> <p>25 called Model-Order Reduction For Nonlinear</p>	<p>91</p> <p>1 to -- certainly goes to bias and impeachment at</p> <p>2 this point, so...</p> <p>3 MS. CORL: Same objections.</p> <p>4 MR. PATTAKOS: Mm-hmm.</p> <p>5 Christina, I will e-mail this to you.</p> <p>6 I'll e-mail you the link. I just need to run to</p> <p>7 my printer. I'll be right back.</p> <p>8 (Off the record.)</p> <p>9 MR. PATTAKOS: Okay. I need access to the</p> <p>10 exhibit upload doohickey.</p> <p>11 I need to upload a new exhibit, please.</p> <p>12 TRIAL TECHNICIAN: No worries. The link I</p> <p>13 put in the chat should still be available.</p> <p>14 MR. PATTAKOS: Oh, thank you, thank you.</p> <p>15 I need to open that chat back up. Thank you,</p> <p>16 thank you.</p> <p>17 I've honestly never done this before, with</p> <p>18 such a good system. We usually just use e-mail</p> <p>19 and confirm with the court reporter, so this is</p> <p>20 terrific.</p> <p>21 I think that will work. Boom.</p> <p>22 This will be Exhibit 5.</p> <p>23 (Canova Deposition Exhibit 5 marked.)</p> <p>24 MS. CORL: Object to the exhibit.</p> <p>25 You can go.</p>
<p>90</p> <p>1 Distributed Parameter Systems With Application to</p> <p>2 Internal Combustion Engine Modeling and</p> <p>3 Simulation.</p> <p>4 Does that title ring a bell for you?</p> <p>5 A It is familiar. It's one of my research</p> <p>6 areas.</p> <p>7 Q That was Stephanie Stockar's dissertation;</p> <p>8 correct?</p> <p>9 A Yes.</p> <p>10 Q And this is published online at OhioLINK;</p> <p>11 right?</p> <p>12 A I believe so.</p> <p>13 Q And it says here on OhioLINK that there's</p> <p>14 a committee --</p> <p>15 A Yes.</p> <p>16 Q -- listed here.</p> <p>17 And on that committee is Yann Guezennec,</p> <p>18 and you, Marcello Canova, as advisors; correct?</p> <p>19 A Correct.</p> <p>20 No, I'm sorry, that is not correct. I was</p> <p>21 not the advisor. Yann Guezennec was the advisor.</p> <p>22 Q You are listed as an adviser on OhioLINK.</p> <p>23 We can -- I will go ahead and print the exhibit.</p> <p>24 MS. CORL: Objection, relevance.</p> <p>25 MR. PATTAKOS: Well, it certainly goes</p>	<p>92</p> <p>1 MR. PATTAKOS: It says it has been</p> <p>2 uploaded.</p> <p>3 TRIAL TECHNICIAN: Okay. I have that</p> <p>4 here. Just give me one moment, please.</p> <p>5 Would you like me to put that up?</p> <p>6 MR. PATTAKOS: Please. Yes.</p> <p>7 MS. CORL: We need it a little bit bigger.</p> <p>8 MR. PATTAKOS: Yeah, we need it a lot</p> <p>9 bigger.</p> <p>10 For the record, I pulled this document</p> <p>11 from the following web link:</p> <p>12 https://etd.ohiolink.edu/apexprod/rws_olink/r/1501</p> <p>13 /10?clear=10&p10_accession_num=osu1372847649.</p> <p>14 Dr. Canova, can I just --</p> <p>15 Yeah, go ahead.</p> <p>16 MS. CORL: Note our objection to this</p> <p>17 exhibit.</p> <p>18 MR. PATTAKOS: Yep. It's noted.</p> <p>19 BY MR. PATTAKOS:</p> <p>20 Q So, Dr. Canova, this, you would agree, is</p> <p>21 at least what OhioLINK represents to be a summary</p> <p>22 of your wife Stephanie Stockar's dissertation</p> <p>23 paper; correct?</p> <p>24 A The abstract that is displayed at this</p> <p>25 moment?</p>

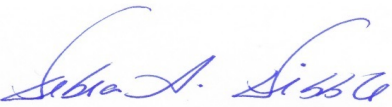
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<p>93</p> <p>1 Q Mm-hmm.</p> <p>2 A Yes.</p> <p>3 Q Okay. Are you familiar with OhioLINK?</p> <p>4 A Yes.</p> <p>5 Q What is OhioLINK?</p> <p>6 A OhioLINK is repository that is controlled</p> <p>7 by the graduate school where all of the teachers</p> <p>8 and dissertations of all OSU to be uploaded to</p> <p>9 satisfy the administrative requirements that lead</p> <p>10 to the passing of the final exam and the release</p> <p>11 of the certificate.</p> <p>12 Q So this is a government website; correct?</p> <p>13 A It is.</p> <p>14 Q Yeah, I see that it's -- there's an</p> <p>15 Ohio.gov stamp on the upper right corner of this</p> <p>16 website, but it does not appear on the printout.</p> <p>17 So my apologies there.</p> <p>18 But it does -- the governor's name is at</p> <p>19 the bottom of page 3, Mike DeWine, I will note.</p> <p>20 Do you see that?</p> <p>21 A I never knew that. Okay.</p> <p>22 Q So you have no reason to believe that</p> <p>23 OhioLINK would falsify records, do you, sir?</p> <p>24 A I do not know that.</p> <p>25 Q Okay.</p>	<p>95</p> <p>1 record is and the advisor of record is Yann</p> <p>2 Guezennec.</p> <p>3 So I'm as surprised as you are to see</p> <p>4 this.</p> <p>5 Q Okay. And let's talk about what we're</p> <p>6 seeing here that's so surprising. Can we go down</p> <p>7 to the second page, please?</p> <p>8 Right there. And do you see where it says</p> <p>9 committee? It says Marcello Canova listed as</p> <p>10 advisor; correct?</p> <p>11 A Yes.</p> <p>12 Q And that's -- it's just not true that you</p> <p>13 were the advisor; correct?</p> <p>14 A I know that I was not the advisor.</p> <p>15 Q Okay. But you were on the committee?</p> <p>16 A I was on the committee.</p> <p>17 Q Did you disclose your romantic</p> <p>18 relationship with Ms. -- with Dr. Stockar before</p> <p>19 you were approved to serve on this committee?</p> <p>20 A I absolutely did.</p> <p>21 Q You did? And that cleared conflicts of</p> <p>22 interest?</p> <p>23 A Not in this specific case.</p> <p>24 Q Why not?</p> <p>25 A Because I don't know if-- I do not have a</p>
<p>94</p> <p>1 MS. CORL: Can you make that bigger so we</p> <p>2 can see -- we can't see this.</p> <p>3 MR. PATTAKOS: I e-mailed it to you, too,</p> <p>4 Christina, and you can pull it right up on the</p> <p>5 internet. You can Google Stockar and Canova --</p> <p>6 MS. CORL: I'm sitting in a trial</p> <p>7 deposition right now and I'm not going to pull up</p> <p>8 anything, but go ahead.</p> <p>9 MR. PATTAKOS: Mm-hmm.</p> <p>10 BY MR. PATTAKOS:</p> <p>11 Q I really -- the question pending is</p> <p>12 whether Dr. Canova has any reason to believe that</p> <p>13 OhioLINK would falsify documents.</p> <p>14 A I cannot -- I cannot answer the question.</p> <p>15 What you pointed in my opinion is a clerical</p> <p>16 mistake.</p> <p>17 Q Okay. That's fine. And that's your</p> <p>18 opinion, or that's what you believe. That's fine.</p> <p>19 But it does -- do you see where it --</p> <p>20 A Sorry, that is not what I believe, that is</p> <p>21 what I know, because I was not the Ph.D. advisor</p> <p>22 of Dr. Stephanie Stockar.</p> <p>23 Q Okay.</p> <p>24 A There are other documents in our</p> <p>25 departments where we write who the advisor of</p>	<p>96</p> <p>1 financial interest or any other form of interest</p> <p>2 in serving as a committee member for Ph.D. exam.</p> <p>3 I'm not the advisor of record. I am not the</p> <p>4 principal investigator that's paid for the funding</p> <p>5 of the graduate student. And there is another</p> <p>6 reason that is purely academic.</p> <p>7 You know, when you read the title, you</p> <p>8 asked me if I'm familiar and I told you that this</p> <p>9 is -- might read familiar because it's my research</p> <p>10 area. Unfortunately in science there are not many</p> <p>11 professors who are confident and familiar with a</p> <p>12 specific field of research, and that's why I was</p> <p>13 asked to serve as the committee member of</p> <p>14 Stephanie Stockar's exam.</p> <p>15 Q Even despite the romantic relationship?</p> <p>16 A I did disclose the romantic relationship</p> <p>17 to the advisor and to our programs, and the</p> <p>18 advisor and the graduate programs decided that</p> <p>19 there was not a conflict of interest and they</p> <p>20 allowed me to take part of the exam.</p> <p>21 Q Who exactly did you disclose this to?</p> <p>22 A So I disclosed it to --</p> <p>23 Q -- besides Mr. --</p> <p>24 Sorry, go ahead.</p> <p>25 I understand that you disclosed it to Yann</p>

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<p>97</p> <p>1 Guezenne. Who else, what other persons did you 2 disclose this to?</p> <p>3 MS. CORL: Object to this whole line of 4 questioning for relevance, but go ahead.</p> <p>5 A I did disclose it to all of the committee 6 members, so to Giorgio Rizzoni and to Terrence 7 Conlisk.</p> <p>8 BY MR. PATTAKOS:</p> <p>9 Q Anyone else?</p> <p>10 A It's 2013. I don't remember, but 11 definitely, at that time, our colleagues and 12 coworkers knew about that.</p> <p>13 Q Okay. Let's go back up to the top of this 14 document.</p> <p>15 Model-Order Reduction For Nonlinear -- 16 I just want to see the title. Thank you.</p> <p>17 Model -- there it is.</p> <p>18 So again, the title is Model-Order 19 Reduction For Nonlinear Distributed Parameter 20 Systems With Application to Internal Combustion 21 Engine Modeling and Simulation.</p> <p>22 A Yes.</p> <p>23 Q And you are one of the few people in the 24 world that could understand this?</p> <p>25 A No, I don't have the presumption to say</p>	<p>99</p> <p>1 THE VIDEOGRAPHER: Please stand by. We're 2 going off the record at 6:34 p.m. 3 (Recess taken, 6:34 p.m. to 6:40 p.m. EDT)</p> <p>4 THE VIDEOGRAPHER: We're going back on the 5 record and the time is 6:41 p.m.</p> <p>6 BY MR. PATTAKOS:</p> <p>7 Q Dr. Canova, have you ever gone back and 8 looked at your phone records in connection with 9 this lawsuit?</p> <p>10 A My phone records?</p> <p>11 Q Mm-hmm.</p> <p>12 A Are you asking now? Are you asking during 13 the exam? after the exam?</p> <p>14 Q I'm asking have you -- in connection with 15 this lawsuit, have you ever went back to look at 16 your phone records relating to this lawsuit at all 17 about the events in question?</p> <p>18 A I don't remember.</p> <p>19 Q You don't remember? Have you ever gone 20 back to obtain your phone records, records of 21 incoming calls or outgoing calls to either look at 22 yourself or provide to anyone in this litigation?</p> <p>23 A No.</p> <p>24 Q Hmm. Okay.</p> <p>25 MR. PATTAKOS: I have no further questions</p>
<p>98</p> <p>1 that, but I am one of the few people at the Ohio 2 State who can serve in the committee.</p> <p>3 Q Is that typical for dissertations?</p> <p>4 A What is typical for dissertations? Sorry.</p> <p>5 Q For only a few professors there to be able 6 to effectively serve on the committee?</p> <p>7 A Generally, for evaluating the quality of 8 Ph.D. students, you need to have faculty or 9 experts with that area of research. And there are 10 not many faculty in the department that are no 11 knowledgeable or expert or experience with a 12 specific research area.</p> <p>13 Q Okay.</p> <p>14 A I'm sure it's the same in your field.</p> <p>15 Q Well, I'll tell you, our field is more of 16 an art than a science, I say. And more of a 17 practice. But it's very interesting. I would 18 enjoy -- I would probably enjoy debating that with 19 you.</p> <p>20 A I would love to.</p> <p>21 Q I appreciate that. I think I just need 22 one more short break and then I hope that we're 23 done at this point. Thank you. Just give me one 24 more short break.</p> <p>25 MR. PATTAKOS: Sorry, thanks.</p>	<p>100</p> <p>1 subject to any questions by defense counsel.</p> <p>2 MS. CORL: I've got no questions. Let's 3 finish up what we need to do with the court 4 reporter.</p> <p>5 THE VIDEOGRAPHER: I'll take us off the 6 record, first, so please stand by.</p> <p>7 Here ends today's deposition of Marcello 8 Canova, Ph.D. We're going off the record at 9 6:42 p.m.</p> <p>10 (Time noted: 4:48 p.m. EDT)</p> <p>11 --o0o--</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2 I, MARCELLO CANOVA, PH.D., do hereby</p> <p>3 acknowledge that I have read and examined the</p> <p>4 foregoing testimony, and the same is a true,</p> <p>5 correct and complete transcription of the</p> <p>6 testimony given by me and any corrections appear</p> <p>7 on the attached Errata sheet signed by me.</p> <p>8</p> <p>9</p> <p>10 _____</p> <p>11 (DATE) (SIGNATURE)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	101
<p>1 CERTIFICATE OF REPORTER</p> <p>2 I, Debra A. Dibble, hereby certify that</p> <p>3 the witness in the foregoing deposition was by me</p> <p>4 duly sworn to tell the truth, the whole truth, and</p> <p>5 nothing but the truth in the within-entitled cause;</p> <p>6 That said deposition was taken in</p> <p>7 shorthand by me, a disinterested person, at the</p> <p>8 time and place therein stated, and that the</p> <p>9 testimony of the said witness was thereafter</p> <p>10 reduced to typewriting, by computer, under my</p> <p>11 direction and supervision;</p> <p>12 That before completion of the deposition,</p> <p>13 review of the transcript [] was [x] was not</p> <p>14 requested. If requested, any changes made by the</p> <p>15 deponent (and provided to the reporter) during the</p> <p>16 period allowed are appended hereto.</p> <p>17 I further certify that I am not of counsel</p> <p>18 or attorney for either or any of the parties to</p> <p>19 the said deposition, nor in any way interested in</p> <p>20 the event of this cause, and that I am not related</p> <p>21 to any of the parties thereto.</p> <p>22 Dated: 2-23-2023</p> <p>23</p> <p>24 </p> <p>25 Debra A. Dibble, RDR, CRR, CRC, Notary Public</p>	102

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